

Appendix 1 – Internal and External Consultees

Internal Consultees

GBC Commercial Health

No objections to the variation. The initial comments made on 20221293 in December 2022 still stand and are repeated here for clarity.

Health and Safety

In these premises Gravesham Borough Council (GBC) Environmental Health will be the enforcing authority. The applicant must ensure that these premises comply fully with the Health and Safety at Work (etc) Act 1974 and all relevant regulations made there under. For information and advice on health and safety matters check out the HSE website www.hse.gov.uk or contact the Environmental Health team on commercialhealth.admin@gravesham.gov.uk

This workplace will be immediately subject to the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992. Particular attention should be made to the following requirements.

- Regulation 6 requires that effective and suitable provision shall be made to ensure that every enclosed workplace is ventilated by a sufficient quantity of fresh or purified air.
- Regulation 14 requires that every window or other transparent or translucent surface in a door or gate shall where necessary for reasons of safety be constructed of a safety material or be protected against breakage and also be appropriately marked.
- Regulation 20 requires that suitable and sufficient sanitary conveniences shall be provided at readily accessible places. Where between 6 and 25 persons are employed a minimum of 2 water closets must be provided.

Food Safety Comments

I am unable to fully comment on the structure of the kitchen as the plans do not provide me with a detailed layout. General comments are therefore made.

It is a requirement under Article 6(2) of Regulation 852/2004 that food business operators must register their establishments with the appropriate competent authority (in this case GBC Environmental Health) at least 28 days before food operations commence. Registration is via the Gravesham Borough Council website www.gravesham.gov.uk/food-safety

The applicant must ensure that the kitchen fully complies with current food safety legislation to the satisfaction of the Regulatory Services Manager. Structural and operational requirements are covered by the legislation notably Assimilated EC Regulation 852/2004.

All internal structures to the kitchen must be impervious, non-absorbent and washable i.e. easy to clean and maintain in a clean condition.

Where inspection chambers become part of the internal structure of the kitchen they must be closed with a secure, sealed, airtight cover.

Ensure that any waste pipes which become part of the internal structure of the kitchen terminate externally at an appropriate height.

Any floor drains which become part of the internal structure of the kitchen must be fitted with a close-fitting grill which is easy to clean.

The kitchen should be pest proofed as far as possible i.e. gaps and holes to external doors, windows, pipes and drains etc. must be filled or covered with a solid, durable material in order to minimise pest entry points into food preparation and storage areas.

Lavatories must not lead directly into rooms in which food is handled, stored or prepared. There should be an intervening ventilated space between toilets and food rooms. Food should not be stored in that space.

The provision and location of sinks and wash hand basins is an important consideration in the design and planning of a kitchen. A minimum of 1 wash hand basin and a double sink unit must be installed. A dish washer is also recommended.

The layout and scale of the business operation is such that mechanical ventilation, with a balanced air intake and appropriate extract system, is likely to be required. This will need to achieve a minimum of 30 air changes per hour and a maximum ambient temperature of 25C within the working kitchen. I recommend that you contact a specialist contractor in this regard.

For further advice on starting a food business please visit the FSA website

<https://www.food.gov.uk/business-guidance>

GBC Leisure

Please find below comments from the Leisure Team – Communities & Inclusive Growth Directorate with regards to the above Application for Full Planning.

Gravesham Borough Council is committed to providing replacement-built leisure provision and the role that it can play in health inequalities.

The 2022 Leisure Centre Feasibility Study, compiled by Knight, Kavanagh & Page concludes that the current Cascades and Cygnet Leisure centres are ageing and have issues in respect of their building quality. Whilst being well located in respect of their accessibility to Gravesham residents, they do not provide a modern, flexible offer to the community.

A new community focussed, family orientated new facility to replace the existing Cascades leisure centre at its existing site is recommended.

Therefore, the Leisure Team are in total support of the Application for Full Planning for a new leisure centre in Thong Lane, Gravesend.

GBC Environmental Protection

It is understood that this variation represents a reduction in size of the granted development, removal of some of the elements and some changes to the layout, facilities and plant areas. As a result of these amendments, changes to various conditions are needed.

The updated CEMP is acceptable.

The updated Air Quality Assessment is accepted.

A Noise Impact Assessment Addendum has been submitted and reviewed. It's noted that the Addendum advises that plant noise emission limits were proposed to be no more than background in the initial NIA and these limits are re-iterated with this variation. However, our standard criteria is that plant noise levels will be *10dB below* existing background when assessed in accordance with BS4142 and this is the level specified in Condition 23 and should be re-iterated. It would not be reasonable to vary this condition, when it is condition used across the district in other planning applications/permissions:

- If relevant, the rating noise from fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014*

There is no objection to the changes to the wording of Conditions 10 of 23 which updates the references to BS4142 to the most recent version of the standard.

The changes to the kitchen ventilation system are acceptable. Condition 17 of the original application should be re-iterated.

External Consultees

Southern Gas Networks

Thank you for your enquiry , there is a high pressure pipeline in the vicinity of your works. Your proposals would require the exact location of this pipeline and other SGN assets to be located before any work commences, either by electronic detection or by hand excavated trial holes as specified in the attached SW/2 document. These works must be supervised by an SGN representative, please contact Thomas Skinner on 07974455867 / thomas.skinner@sgn.co.uk to arrange a pre-works site visit and any future supervision. We would like to reiterate that no works should be carried out within the vicinity of a high pressure pipeline until consultation with an SGN representative has occurred. We thank you for your patience at this time

Please note that no mechanical excavations are permitted within 3m of the pipeline at any time.

This pipeline is registered with the Health and Safety Executive as a Major Accident Hazard Pipeline.

SGN High Pressure Gas Pipelines in the vicinity of your works		
Pipeline Number	Pressure Regime	Building Proximity Distance (Zone 1)
GM20	HP	9.0
This table does not include SGN's low medium and intermediate pressure assets, which may be in the vicinity.		

Building Proximity Distance

The building proximity distance (Zone 1) for the pipeline is shown in the table above for all our high pressure gas pipelines in the vicinity of your works. This should not however be confused with the HSE consultation zones 2 & 3 which will be considerably greater, further guidance of the requirements can be found in HSE Document: PADHI: HSE's Land Use Planning Methodology. Zone 1 is a safety factor with reference to habitable buildings as recommended by IGE TD/1. It is calculated from the diameter, material, wall thickness and pressure of the particular pipeline. Under Pipeline Safety Regulations 1996 this distance is declared to the HSE. Any intrusion within this safety zone will not be taken lightly and any intention to proceed should be accompanied by a risk assessment or provision of other supporting evidence, especially in the event of any legal proceedings at a later date.

Vehicle Crossing

Vehicle crossings over the pipeline must be kept to a minimum and must cross at 90 degrees. The crossing will require agreement with SGN and may require design and calculations, as evidence to prove there is minimal added stress to the pipeline. Method statements must be agreed before works commence.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW/2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence. Further guidance / restrictions are detailed below:

1. No mechanical excavation is allowed within 3 metres either side of pipeline.
2. No plant or storage of equipment shall be made within any easement strip.
3. If any metallic pipes or cables are being laid in proximity to gas pipelines then interference testing will be required, the cost of which to be borne by the promoter of the works. A minimum clearance of 600mm is required.
4. All precautions stated in publication SGN/WI/SW/2 (Safe Working in the Vicinity of High-Pressure Gas Pipelines) shall be fully complied with in all respects. Acceptance of SGN/WI/SW/2 shall be acknowledged by the responsible site person signing and returning the form Appendix A (back page) to the SGN representative contacted in (7).
5. No thrust boring shall take place within 3 meters of the pipeline.
6. All planting within the easement strip should comply with 'Notes for Guidance on Tree Proximity'.
7. Before commencing work on site you must contact our Pipeline Maintenance Section on the number above at least seven days before work commences. A Southern Gas Networks representative will then contact you to arrange to visit site. Details of working near to high-pressure gas pipelines can then be discussed.
8. Pipeline sections that are planned and agreed by SGN to be permanently covered (i.e. by road surface) will require a coating survey. SGN will repair any indicated coating defects free of charge. The survey costs will be borne by the promoter of the works. Prior to any surface cover cathodic protection coupons and reference cells will require installation at no cost to SGN.
9. This pipeline is cathodically protected and as such has test cables located in test posts, were these to be lost through this work we would look to you for remedial action at no cost to SGN.

10. Intrusive construction methods will require an agreed method statement prior to work starting.

11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.

12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or boreholing must take place within 3 metres of the pipeline.

Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.

Please note that further restrictions on activities may need to be imposed as a result of a site inspection.

For any further information please contact SGN on the details above.

UK Power Networks

The proposed development is in close proximity to our substations and have the following observations to make:

If the proposed works are located within 6m of the substation, then they are notifiable under the Party Wall etc. Act 1996. The Applicant should provide details of the proposed works and liaise with the Company to ensure that appropriate protective measures and mitigation solutions are agreed in accordance with the Act.

The Applicant would need to be responsible for any costs associated with any appropriate measures required.

Any Party Wall Notice should be served on UK Power Networks at its registered office: UK Power Networks, Newington House, 237 Southwark Bridge Road, London SE1 6NP.

Our engineering guidelines state that the distance between a dwelling of two or more stories with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building.

It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties.

This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.

A problem can also occur when footings of buildings are too close to substation structures.

Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, you can imagine, is very annoying, In practice there is little that can be done to alleviate these problems after the event.

We therefore offer advice as follows:

1. The distance between buildings and substations should be greater than seven metres or as far as is practically possible.
2. Care should be taken to ensure that footings of new buildings are kept separated from substation structures.
3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.

Minimum distance for this should be at least 10m.

4. If noise attenuation methods are found to be necessary, we would expect to recover our costs from the developer.

Other points to note:

5. UK Power Networks require 24 hour vehicular access to their substations. Consideration for this should be taken during the design stage of the development.
6. The development may have a detrimental impact on our rights of access to and from the substation. If in doubt please seek advice from our Property and Consents team at Barton Road, Bury St Edmunds, Suffolk, IP32 7BG.
7. No building materials should be left in a position where they might compromise the security of the substation or could be used as climbing aids to get over the substation surround.
8. There are underground cables on the site associated with the substation and these run in close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.
9. All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.

Should any diversion works be necessary as a result of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG

Sport England

Thank you for consulting Sport England in respect of the details submitted under the above planning reference to variation of condition 2 (Approved Plans), condition 10 (Noise Assessment), condition 19 (Soft Landscaping Scheme) part iii, condition 23 (Noise Assessment), condition 34 (Energy Efficiency) and removal of condition 13 (Play Equipment) attached to planning permission reference number 20221293.

Conditions 10 (Noise Assessment), condition 19 (Soft Landscaping Scheme) part iii, condition 23 (Noise Assessment), condition 34 (Energy Efficiency) and removal of condition 13 (Play Equipment) are outside Sport England's area of expertise.

We have reviewed the information submitted in support of the variation of condition 2 (Approved Plans) and have no issues in this being approved.

Sport England raises no objection to the variation of condition 2 (Approved Plans) being granted.

If you have any queries, please contact the undersigned.

Kent Downs National Landscape

The Kent Downs National Landscape team has seen a recent uplift in the number of consultations on planning applications. In accordance with the agreed Kent Downs Planning Protocol, which sets out that the Kent Downs Landscape team will only have a limited land use planning role and will prioritise its involvement in planning to planning policy matters, we will not normally provide bespoke comments on more minor applications or where impacts to the KDNL would be relatively limited, such as this. This does not imply support for, or objection to, the proposal. If our input would be particularly valued in this instance, please get in touch and we endeavour to provide informal advice where our current planning capacity allows.

In determining the application, the local planning authority has a new statutory duty, as set out above, to seek to further the purpose of conserving and enhancing the natural beauty of the Kent Downs National Landscape. Further advice on the new duty is provided in Appendix 2 of this letter. The Kent Downs National Landscape team recommends that to help fulfill the new statutory duty, the Local Planning Authority should ensure that the decision is consistent with relevant national and local planning policy and takes into account the aims, objectives and principles set out in the Kent Downs AONB Management Plan and its associated guidance documents. Further details of these are provided in Appendix 1.

I hope this is of assistance to you. I would be happy to discuss further if this would be helpful.

Environment Agency

Thank you for consulting us on the above application which we received on 10 March 2026. As part of this consultation, we have reviewed the following documents:

- Cover letter (ref. 65610/02/NG/HP/40654334v1, dated 2 March 2026, by Lichfields)
- Site Plan (ref. GCLC- ASP- B1- XX- D- A- 0803- P03, dated 9 December 2025, by Space & Place)
- Flood Risk Assessment & Drainage Strategy (ref. 7313-FUR-ZZ-XX-RP-D-0901, dated 12 January 2026, by Furness)

Environment Agency position

We have no objection to the proposed variation.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Decision notice

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

National Highways

Thank you for your email dated 10 March 2026 consulting National Highways on the above application and seeking a response no later than 31 March 2026.

Please find attached our response of **No objection** noting the comments with regards the site's proximity to the planned Lower Thames Crossing.

If any party has any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Please also note that any Gravesham consultations regarding planning matters should be sent to planningse@nationalhighways.co.uk rather than info@nationalhighways.co.uk.

Kent Fire and Rescue

Thank you for your email dated 10 March 2026. Following my assessment of Fire and Rescue Service emergency access provisions for application number 20260238 I would like to make the following observations.

I note that the proposed perimeter access route narrows to approximately 3m along the southern boundary and there does not appear to be turning facilities available for a fire appliance, resulting in a dead-end access route. As the total floor area is 6037m² (D&A Statement, GCLC-ASP-B1-XX-RP-A-08101-P02) please ensure that emergency perimeter access to the proposed building meets the minimum requirements of Section 15; Tables 15.1 and 15.2 of ADB, Volume 2.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

If you require any further advice, please contact this office using the details above. Please be aware that the Building Safety office hours are 09:00-17:00 Monday to Friday.

KCC Flood and Water Management

Kent County Council as Lead Local Flood Authority have reviewed the submitted Section 73 application. Based on the information provided, we are satisfied that the proposed variation does not affect the drainage strategy for the site. As such, we have no comments to make on this application.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

KCC Public Rights of Way Officer

Public Right of Way NG8 lies to the south of the proposed site and will remain unaffected by the development. I enclose a copy of the Public Rights of Way network maps showing the line of the path for your information.

The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary closures be required to

ensure public safety then this office will deal on the basis that:

- The applicant pays for the administration costs.
- The duration of the closure is kept to a minimum.
- Alternative routes will be provided for the duration of the closure.
- A minimum of six weeks' notice is required to process any applications for temporary closures.

This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any building materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.

KCC Highways

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

As far as I can see from the Transport Assessment Addendum dated 5th January 2026 there is no significant change to the highway impact of this application since the floor area is reduced (and therefore in theory less traffic movements) but the car parking, cycle parking, and site layout are unchanged from the permitted development. The conclusion of the TA Addendum is that there are no changes to the highway impact.

I therefore raise no objection on highway grounds to this Section 73 Amendment.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

KCC Minerals and Waste

Thank you for consulting the County Council's Minerals and Waste Planning Policy Team on the above matter.

I have no land-won minerals or waste management capacity safeguarding objections or comments to make regarding this planning application.

Health and Safety Executive

Thank you for your email seeking HSE's observations on application 20260238.

HSE is a statutory consultee for certain developments within the consultation distance of major hazard sites and major accident hazard pipelines, and has provided planning authorities with access to the HSE Planning Advice Web App - <https://pa.hsl.gov.uk/> - for them to use to consult HSE and obtain HSE's advice.

However, this application does not fall within any HSE consultation zones. There is therefore no need to consult the HSE Land Use Planning (LUP) team on this planning application and the HSE LUP team has no comment to make.

I would be grateful if you would ensure that the HSE Planning Advice Web App is used to consult HSE on any future developments including any which meet the following criteria, and which lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.

- residential accommodation;

- more than 250m² of retail floor space;
- more than 500m² of office floor space;
- more than 750m² of floor space to be used for an industrial process;
- transport links;
- or which is otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

There are additional areas where HSE is a statutory consultee. For full details, please refer to annex 2 of HSE's Land Use Planning Methodology:

www.hse.gov.uk/landuseplanning/methodology.htm

NB HSE is a statutory consultee with regard to building safety (in particular to fire safety aspects) for planning applications that involve a relevant building.

A relevant building is defined in the planning guidance at gov.uk as:

- containing two or more dwellings or educational accommodation and
- meeting the height condition of 18m or more in height, or 7 or more storeys

If the planning application relates to Fire Statements and applications relating to relevant buildings, then these are not dealt with by the Land Use Planning team and instead they should be sent to PlanningGatewayOne@hse.gov.uk

There is further information on compliance with the Building Safety Bill at <https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021>.

The Health and Safety Executive (HSE) is conducting a programme of research to understand the needs of people using the services for Planning Advice (including the planning advice web app), Hazardous Substance Consent and their related guidance.

This helps us create services that work better for the public and for government.

Participation is voluntary. If you would like to be informed about opportunities to participate, please read and complete this consent form:

<https://forms.office.com/e/twNqwPKE9x>. If you need a different format or have questions about this research, please contact the user research team on LUPuserresearch@hse.gov.uk and we will do our best to help.