

21st June 2026

Sarah Carpenter
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Dear Sarah,

Ref: McDonald's Woodlands Gravesend – KCC Highways and EHO Lighting Requirements

Following your emails regarding the external lighting concerns raised by the Highways team and Environmental Health Officer at Kent County Council, please see below the mitigation measures that have been taken in order to ensure that the lighting design satisfies their respective requirements. Please refer to the points below in conjunction with the revised Signify Isolux light plot with the drawing reference: 7003414 – Rev 1

Kent County Council – Highways and Transportation

"Based on the lighting calculation provided, there is too much back spill lighting falling onto the adjacent footpath. This section of road is illuminated to a P2 class which is a 10 lux average across the adopted area, so an increase of over half again as much will adversely impact the lighting levels at the point in the road."

"On this basis, it is recommended that the applicant amends the proposed lighting scheme and updates the lighting calculation to adhere to the requirements. KCC H&T are unable to provide a recommendation on this planning application until the proposals are revised and further information is submitted."

There are currently three 10m high highways columns within the 94m long frontage of the site that use 1.8m projection arms and LED directional luminaires to achieve the P2 class illumination requirements. The central location is opposite the site bell mouth entrance.



The original Signify Isolux lighting plot utilised the five existing 5m high columns located within the hedge line of the eastern boundary of the site. The luminaires incorporated back light louvres but were unable to prevent the overspill of light onto the pedestrian path. The 6.25 lux contour showed the extent of the light overspill.

The revised Signify Isolux lighting plot uses new 5m high columns and locations with 1m extension arms together with a different type of luminaire that has integrated back light louvres behind each LED optic. The 6.25 lux contour hugs the external edge of the hedge and shows that there is no light overspill onto the path. The contours are plotted at ground level so, in reality, the 6.25 lux illumination level is within the width of the hedge and will not extend beyond the outer edge. The DX51 optic specified has a sharp light cut off shown by the polar curve (light footprint) illustration below:



The requirement of the Highways and Transportation team has been met. There will be no impact on the P2 class lighting levels intended for the Wrotham Road and the two pedestrian footpaths.

Kent County Council – GBC Environmental Protection

“Generally, the submitted lighting details are acceptable and for the majority of the site are in accordance with the ILP guidance ‘GN01 The Reduction of Obtrusive Light’ 2021.

The only exception is the lighting to the north of the site/carpark area which borders the house known as The Cottage. It’s not clear from the application details what the hours of use for the lighting will be, but it’s assumed that the majority will be on 24/7? If this is the case, then at nighttime (after ‘curfew’ usually assumed to be 23:00) the ILP guidance advises that lux levels should be 2 lux or below at the façades of dwellings. The contour diagram submitted shows levels of 6.25 lux at the façade of The Cottage, and this is not acceptable at night-time, particularly as there are windows present.

It is therefore advised that this area is reviewed if lighting is to be on overnight, so that lighting levels at the façade of this building are compliant with the ILP guidance lux levels.”

The Signify Isolux lighting plot has been re-designed in order to ensure that there is no light falling on the façade of the residential property to the north of the site where there are two windows facing east located at approximately 4.5m above ground level. The southern aspect of the property is a tiled, sloping roof that does not have any windows above the hedge height.

The proposed McDonald’s store opening times are: Monday to Sunday – 6.30 to 22.30.

The ILP Guidance Note 01/21 The Reduction of Obtrusive Light sets out the acceptable illumination levels according to the location environmental zone and the pre and post curfew hours. The generally accepted pre and post curfew hours are 23.00 to 06.00. We consider this location to be in an E3 Environmental Zone. The table below indicates a permissible illuminance of 10 lux pre-curfew and 2 lux post-curfew i.e. between 23.00 and 06.00.

Table 3 (CIE 150 table 2): Maximum values of vertical illuminance on premises

Light technical parameter	Application conditions	Environmental zone				
		E0	E1	E2	E3	E4
Illuminance in the vertical plane (E_v)	Pre-curfew	n/a	2 lx	5 lx	10 lx	25 lx
	Post-curfew	n/a	<0.1 lx*	1 lx	2 lx	5 lx

The existing 5m high column is 18m from the east façade windows and uses a floodlight luminaire. There is a direct line of sight from the windows into the floodlight LED light source. The revised design removes this column and locates a new 5m high column with a 1m extension arm 22m away from the east façade windows. There is no line of sight from the windows into the Signify luminaire LED light source. These are the existing and proposed comparisons:



The Signify luminaires using the DX51 optics restrict the back light and control the light pool either side. The revised design keeps the ground level 6.25 lux contour within the site boundary. There is no light overspill above the hedge:



There will not be any illumination of the east façade of the property. In addition, the car park lights will be turned off at 22.30 and turned back on at 06.30. These timings are within the accepted pre and post curfew period.

Bruce Robinson
Managing Director