

Appendix 2 – Internal and External Consultees

Internal Consultees

GBC Waste and Refuse

I have reviewed the planning application and have concerns regarding the potential increase in litter associated with the proposed takeaway restaurant use.

By their nature, takeaway food premises can give rise to increased off-site litter in the surrounding area. My principal concern in this case is the site's proximity to Woodlands Park, which may lead to an increase in discarded packaging within the park and surrounding streets, together with greater pressure on existing litter bins. This could in turn create additional resource and cost implications for the local authority.

If permission is granted, I would expect a litter management plan to be submitted in writing for the site and adjacent land. This should include details of publicly accessible external litter bins within the site, arrangements for their maintenance and emptying, and proposals for regular litter patrols and litter picking in the vicinity of the site.

Given the potential for additional costs to the Council in addressing litter beyond the site boundary, I would also wish to see provision for, or a financial contribution towards, additional litter bins and, if necessary, increased litter-picking resources, particularly during the April to October period when use of the park is at its highest and the risk of littering is likely to be greater.

GBC Environmental Protection

Noise

There is already a significant amount of rooftop plant on the side and rear flat roofs and new plant is proposed in a similar location. A Plant Noise Impact Assessment by AASW dated January 2026 (Ref: 8274 Rev:0) has been submitted and reviewed. The report has worked on the new plant levels being 'no greater than the existing background level' and has designed any mitigation measures to achieve this criteria. Nighttime is not an issue as only some of the plant will be running and the rating level is assessed as being 9dB below background. However, the daytime level is only 1dB below background.

Our standard criteria is that noise from new plant/equipment shall be *10dB below* existing noise levels. This can be addressed by way of a condition unless the applicant wishes to revise the NIA accordingly prior to determination.

The servicing/delivery area is in the same location. I can't see any detail regarding servicing/delivery times. This needs to be clarified with the applicant. Nighttime servicing and delivery should be avoided.

It's noted that the patio area/outside seating area has been relocated from the rear of the building to the front of the building. This could give rise to noise problems from customer voices etc if being used late at night. Keeping the seating area to the rear would be preferable.

No assessment of traffic or customer noise has been made. It's appreciated that the premises has already operated as a restaurant. However, Mc Donalds operates in a different way with more regular customers and a quicker turnaround time for eating in and a much higher

percentage of takeaway customers arriving by car etc. In addition, this type of fast-food restaurant is serviced by a lot of delivery companies such as Uber Eats, Deliveroo etc. Bearing in mind the proximity of residential houses in the area (including adjacent and immediately opposite), a noise impact assessment of this type of noise is advised prior to determination.

Odour

The submitted odour assessment has been reviewed. The odour assessment places the overall risk rating as 'high' and has designed the kitchen extract accordingly with appropriate filtration including ESP and Ozone. Cleaning, maintenance and servicing details have been provided.

GBC Commercial Team

No objection in principle. The following comments are made for the information of the applicant.

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 comment on the structure of the kitchen as the plans do not provide me with a detailed layout. General comments have therefore been 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>

External Consultees

Southern Gas

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.

KCC Biodiversity

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:

It is understood that the site continues to benefit from an existing lawful land use class A3 (Restaurants and Cafés), and that the extant permission would allow the restaurant to be brought back into use without the need for a new planning application. Should this not be the case, KCC should be made aware and re-consulted on the proposals.

The submitted plans and documents do not indicate that a drive thru facility is included, and the comments provided within this response are made on that basis. If a drive thru is proposed, this would represent a different use class (A5) with different transport implications, and therefore a transport statement would be required, including trip generation, parking information, and operational details relevant to the proposed McDonald's use.

Access:

Access arrangements are to remain unchanged, with the existing access continuing to be shared with the Premier Inn.

Vehicle Parking:

The applicant states that minor external works are proposed to the existing car park, including the replacement of two accessible bays with three standard parking bays, along with resurfacing of the car park. I am satisfied that the overall level of disabled parking provision remains adequate. However, the existing parking bays are only 4 metres in length, which is below the required standard and should therefore be increased to 5 metres. Any amendments to vehicle parking must accord with Supplementary Planning Guidance (SPG) 4: KCC Vehicle Parking Standards.

It is recommended that electric vehicle charging provision, active or passive, is provided in line or excess of the Building Regulations Part S.

Cycle Parking:

Six cycle spaces are proposed in the form of three Sheffield Stands. Whilst cycle parking provision is welcomed, the number of spaces proposed may not meet the SPG 4 standards. The applicant should confirm the number of seats to be provided in the restaurant and provide one cycle parking space per 10 seats for short term use and one space per 20 seats for long term use. Cycle parking must be easily accessible, secure and sheltered to promote cycling as a sustainable and attractive method of transport.

Refuse Collection:

Whilst not stated by the applicant, it is understood that deliveries are currently made on site, to the south of the building and that a similar arrangement is proposed for the new development. KCC have no objection to the continued use of the existing delivery strategy.

Conclusion:

I refer to the above planning application and confirm that provided the following requirements are secured by condition, then I would raise no objection on behalf of the local highway authority:-

- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans (14009_AEW_2741_0004) prior to first occupation of the site.
- Provision and permanent retention of the cycle parking facilities shown on the submitted plans (14009_AEW_2741_0004) prior to first occupation of the site.

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.