

Delegated Report

Full Planning Application

Planning Application No:	20250890
Location:	M A H Steel Ltd, Unit G1-G2 West Mill, Gravesend
Description:	Retrospective application for the change of use of part of parking area to allow temporary storage of steel waiting for loading.
Applicant:	MAH Steel
Site Visit Date:	Desktop assessment

Submitted Documents/Plans

Application form
Planning Statement
Transport Statement (8 May 2025)
Flood Risk Assessment (June 2025)
Drawing no. 250206-P-002 (Proposed Site Plan)
Drawing no. 250206-P-001 (Site Plan)
Drawing no. 250206-B-001 (Block Plan and Location Plan)

Relevant Planning History

Reference	Description	Decision	Decision Date
20250669	Retrospective application for the change of use of part of parking area to allow temporary storage of steel waiting for loading, and siting of a spray booth.	Refused	18.08.2025
20190646	Erection of 2.1 metre high metal palisade fencing to the front of the industrial unit.	Refused	16.08.2019
20060617	Subdivision of existing unit into two separate industrial units.	Permitted	17.10.2006
19960574	Erection of external staircase to form fire escape.	Permitted	03.10.1996
19950002	Variation of condition (iv) granted permission under GR/90/313 for installation of a mezzanine floor.	Permitted	01.03.1995
19900313	Erection of single storey building to form industrial/warehouse with ancillary offices at ground, first and second floors together with the layout of ancillary parking provision for 45 cars and 7 lorry spaces (in substitution of units G1 and G2 previously permitted under Ref GR/89/368W).	Permitted	08.06.1990
19890368	Erection of 3 blocks (Units E1 & E2 Units G1 & G2 and Unit G3) of single storey industrial/warehouse units with ancillary first floor offices and 2 blocks (Units F1 to F4 and Units F5 to F7) of single storey industrial/warehouse units with ancillary toilet facilities and laying out of parking	Permitted	17.05.1989

	provision for 126 cars, one van and one lorry space together with details of landscaping (Site B Phase 4)		
19780917	Erection of single storey extension to existing weighbridge office to form additional office accommodation	Permitted	04.12.1978
19544352	Proposed erection of welding shop	Permitted	23.12.1954

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC7 – Other Archaeological Sites
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 6 – Building a strong, competitive economy
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Consultations, Publicity and Representations

External Consultees

I have the following comments to make with respect to highway matters:

This application is a retrospective application in order to regularise the parking area at the front of the existing building. The application is supported by a Transport Statement dated 1st September 2025 produced by Stantec. It is a repeat of a previous application (20250669) which was refused but not on highway grounds.

The Transport Statement demonstrates that the reduction of parking spaces from 45 cars plus 7 HGV spaces to 18 car parking spaces has seen to be adequate for a number of years now without any problems arising. It is not clear, however, either on the plan submitted or in the Transport Statement if the 7 HGV spaces are to be retained. If they are not then the applicant should be questioned as to where HGVs will be parked, or if this parking provision was never required in the first place.

Using SPG4 as the parking standard (these were replaced by KCC in January 2025 but not yet adopted by GBC) this is a maximum standard and therefore a lesser parking level can be accepted and the Transport Statement, using actual evidence of existing travel patterns, demonstrates that there is occasionally a shortfall of 6 spaces which can easily be accommodated in nearby on-street parking spaces with causing any safety or congestion issues in these nearby little-used roads.

It is therefore accepted that the parking reduction, which has been used for several years, does not create local highway concerns. No objection is raised to this application provided that the situation for the HGV parking is explained to you satisfactorily and that a condition is applied for the proposed 18 spaces are retained in the future, plus possibly any HGV parking bays.

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.

Agent Response to KCC Highways Comments 26.09.2025

In relation to the above application I see KCC Highways are still questioning the HGV spaces to the front of the unit.

We specifically covered this in the Transport Statement by Stantec at paragraph 3.2 that states.

"During the day the existing lorry parking at the front of the site will not be required as lorries are out all day making deliveries. When the lorries return in the afternoon / evening they are loaded with the fabricated steel from the front of the building, ready for the next day deliveries. Hence, the lorry parking at the front of the building will be available overnight as is currently the case."

I suspect that they may not have realised that the statement was updated to reflect their comments on the previous application.

Environment Agency

Flood risk standing advice - advice to LPA

The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>. We do not need to be consulted.

Internal Consultees

GBC Environmental Protection

No comments.

Neighbouring properties

The application has been advertised by individual neighbour letters to 37 properties. The overall consultation period expired on 3 October 2025.

Local Ward Councillors were also consulted but no responses were received.

Officer's Analysis

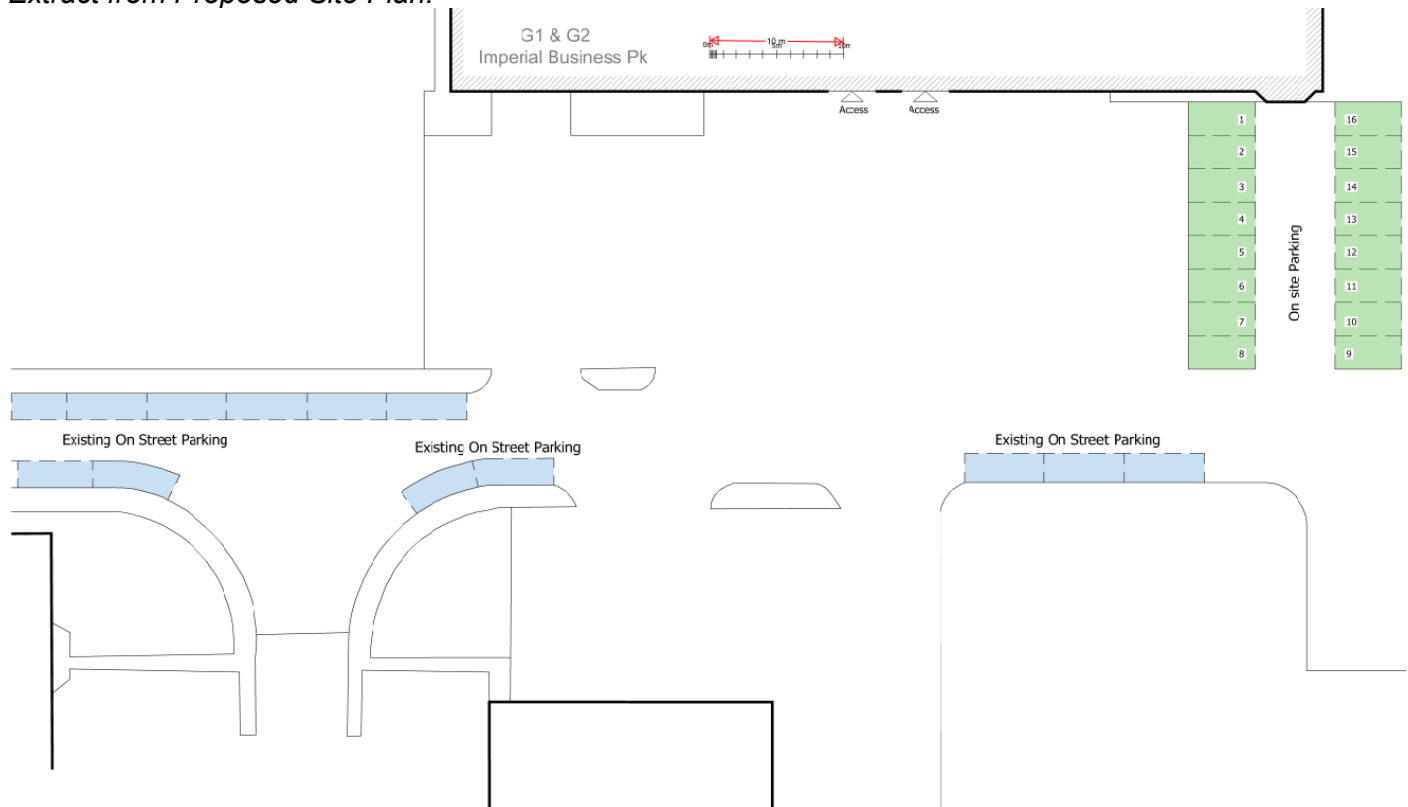
Background

As set out in the Planning History above, application 20250669 was refused. However, the refusal grounds related only to the spray booth that was part of the previous proposal. This has been removed from the current application, which only now concerns the use of the parking area.

Proposal

This application seeks retrospective permission for the change of use of part of parking area to allow for the temporary storage of steel waiting for loading.

Extract from Proposed Site Plan:



Steel is cut and fabricated within the main industrial unit. The cut and formed steel is then brought outside by forklift and then placed on the car parking area to be loaded onto lorries for delivery that day. The steel is not left outside overnight. When the delivery lorries return, they are placed inside the unit for security reasons.

Principle Issues

The site lies within the urban boundary of Gravesend and is located within the Northfleet Embankment and Swanscombe Peninsular East Opportunity Area, and in an Area of Archaeological Potential. As such, the main issues for consideration in the determination of this application are as follows:

- Principle of use
- Design, character and appearance

- Residential amenity
- Parking and highways
- Impact on archaeology

Principle of Use

The site lies within sub-parcel 1.10, Imperial Business Estate, within the Opportunity Area, which is a busy employment area. Policy CS03 of the Local Plan Core Strategy is relevant to this area and seeks to retain it in employment use.

The proposal would not result in any changes to the main employment use at this site (MAH Steel), as it concerns uses relating to the business, and would therefore comply with the requirements of Policy CS03. The proposal is therefore acceptable in principle.

Design, Character and Appearance

Section 12 of the NPPF 2024 relates to achieving well-designed and beautiful places and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The property lies within the urban boundary and comprises an industrial use in an industrial area. There are residential properties at the rear of the site, on Pier Road, which lies to the west.

Current Google Earth Aerial Image:



In terms of the use of the parking area for temporarily storing steel, as this use is temporary in nature while the steel is waiting for loading, it relates to the main use of the site, it would not be out of keeping with the character and appearance of the area. It would be important, however, to restrict any permanent open storage on the site and condition the return of the frontage to its previous layout when no longer needed for the storage of steel.

The proposal is therefore considered to comply with the design requirements of Section 12 of the NPPF 2024 and Policy CS19 of the Core Strategy 2014.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts from pollution.

In terms of light, privacy and visual intrusion impacts from the proposal, as no residential properties directly face the site, there are no amenity matters of concern. The proposal would also not result in any adverse environmental impacts on neighbouring properties.

The proposal would therefore adequately safeguard residential amenity and avoid adverse environmental impacts, in compliance with paragraph 135 of the NPPF 2024 and Policy CS19 of the Core Strategy 2024.

Parking and Highways

With regards to highways issues, the proposal to regularise the use of the parking area at the front of the existing building for the temporary storage of steel is supported by a Transport Statement dated 1 September 2025, produced by Stantec.

KCC Highways have commented on the proposal (see above). Overall, they conclude that the parking reduction, which has been in operation for several years, does not create local highway concerns.

They have, however, queried about whether the 7 HGV spaces set out on the previously approved application GR/89/368/W are to be retained, and if not, where the HGVs will be parked, or if this parking provision was never required in the first place.

The application submissions state in the Transport Statement at paragraph 3.2:

“During the day the existing lorry parking at the front of the site will not be required as lorries are out all day making deliveries. When the lorries return in the afternoon / evening they are loaded with the fabricated steel from the front of the building, ready for the next day deliveries. Hence, the lorry parking at the front of the building will be available overnight as is currently the case.”

KCC states that using SPG4 as the parking standard (these were replaced by KCC in January 2025 but not yet adopted by GBC) this is a maximum standard and therefore a lesser parking level can be accepted and the Transport Statement, using actual evidence of existing travel patterns, demonstrates that there is occasionally a shortfall of 6 spaces which can easily be accommodated in nearby on-street parking spaces with causing any safety or congestion issues in these nearby little-used roads.

It is therefore accepted that the parking reduction, which has been used for several years, does not create local highway concerns.

It must be noted that no objections have been received relating to parking issues on or around the site.

It would be important to apply a condition for the available 16 spaces to be retained in the future.

On the basis of the above comments, there would be no adverse parking or highway issues resulting from the proposal, which complies with Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Archaeology

The site lies within an area of archaeological potential. However, as the proposal is retrospective it would not have a significant below-ground archaeological impact. The proposal therefore complies with Policy CS20 of the Core Strategy 2014 and paragraph 210 of the NPPF 2024.

Flooding

The application site is within Flood Zone 1, with the north-east corner falling into Flood Zone 2. A Flood Risk Assessment has therefore been submitted with the application. The Environment Agency did not have any comments to make on the submission. The proposal therefore complies with the requirements of Policy CS18 of the Local Plan 2014 and paragraphs 176 and 181 of the NPPF 2024.

Conclusion

Matters pertaining to the principle of the proposal, the character and appearance of the development, and residential amenity, parking and highways, archaeology and flooding issues have been addressed satisfactorily, and the proposal is considered to comply with the requirements of Policies CS11, CS18, CS19 and CS20 of the Core Strategy 2014, saved Policies TC7, T1, T5 and P3 of the Local Plan 1994, and

paragraphs 115, 131, 135, 176, 181 and 210 of the NPPF 2024.

The application should therefore be permitted.

Recommendation

Permission subject to conditions.

(For conditions and informatives, see draft decision.)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:	<i>K. Parkin</i>	Signed:	<i>R Hart</i>
Dated:	16 October 2025	Dated:	17th October 2025