

PLANNING STATEMENT

Change of use of part of parking area to allow temporary storage of steel waiting for loading and retention of a spray booth.

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Change of use of part of parking area to allow temporary storage of steel waiting for loading and siting of a spray booth.

Mah Steel, Unit G1-G2

Imperial Business Estate, East Mill, Gravesend DA11 0DL

Mah Steel

May 2025

YOUR REF:

OUR REF: M25/0201-RPT.01

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Contents

Section 1	Introduction	1
Section 2	Site & Surroundings	3
Section 3	Development Proposals	6
Section 4	Planning Policy Framework	7
Section 5	Planning Assessment	11
Section 6	Conclusion	15
Appendix 1	Approved Parking Plans	

Introduction

Section 1

- 1.1 This Planning & Design statement has been prepared by **Tetlow King Planning** on behalf of **Mah Steel** to accompany the planning application for a change of use of parking area to allow temporary storage of steel awaiting loading and the siting of a spray booth.
- 1.2 This statement provides the background to the proposals, together with a description of the site and surroundings. The Statement demonstrates the planning merits of the proposals, having regard to relevant National and Local Planning Policy and other important material considerations upon which it is considered this application should be determined.
- 1.3 By way of background, the applicant is a long-term local employer that has been operating and serving customers in Kent for many years.

1.4 This Planning Statement is set out in six sections:

- Section 2 sets out the context of the site and its surroundings (including the planning history);
- Section 3 sets out the details of the proposals;
- Section 4 sets out the planning policy context and explores other material considerations;
- Section 5 sets out the planning justification for the application cross referencing the proposals against the planning policy context and other material considerations; and
- Section 6 provides a summary and concludes that the proposals are supported by planning policy, therefore justifying the application should be approved.

Site & Surroundings

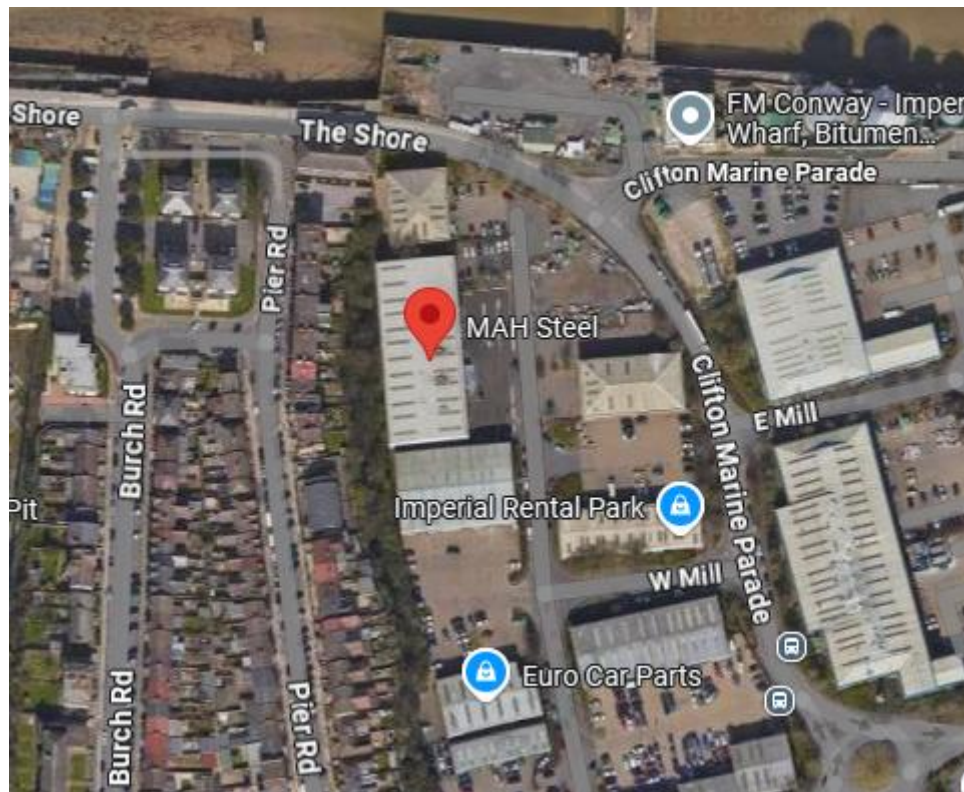
Section 2

Accessibility

- 2.1 The application site is located on the Imperial Business estate at the junction of Clifton Marine Parade and Thames Way.

Site Characteristics

- 2.2 The site is located within an existing business park and consists of typical industrial units facing West Mill with parking located in front. There is an existing spray booth sited on the car park as shown on the second image below.



Source Google Maps



Planning history

- 2.3 Unit G1-G2 was initially granted approval under reference 1990/0313 and being for: 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). This approval was subject to condition and specifically condition 2 of the approval:

(ii) The area shown on the submitted plan as vehicle parking, loading, off-loading and manoeuvring space shall be used for or be kept available for such use at all times when the premises are in use, and no development whether or not permitted by the Town and Country Planning General Development Order 1988 (as amended), shall be carried out on that area of land or in such a position as to preclude vehicular access to this reserved vehicle parking, loading, off-loading and manoeuvring space.

- 2.4 The approved plans showing the approved parking arrangements are 1040A/B/63 and 1040A/B/4/61 which are appended to this report. From these drawings it is possible to see the authorised use of the central hard standing to the front of the unit was approved for use as parking and loading.
- 2.5 During the night this area shown on drawing 1040A/B/63 would then be available for the parking of any lorries the business might have.
- 2.6 The planning enforcement team has alleged that currently the hard standing area is being used for the open storage of fabricated metal structural items and treatment of

these from a spray booth, including extractors which are situated against the front (east) elevation of the building.

- 2.7 It is unclear exactly when the use first commenced but Google Streetview shows the use in November 2022 and as such for the purposes of the planning application form we have stated that the development occurred on the 1st November 2022.
- 2.8 It was considered therefore that the use of the car park/loading area for open storage and spray treatment in the booth is in breach of the approved details for application 1990/0313 and is unauthorised.
- 2.9 It was established that the unauthorised use and spray booth has been occurring for less than ten years and therefore is not immune from enforcement under Sec 171B of the Town and Country Planning Act 1990 (as amended
- 2.10 However, use of the parking area for the loading and off loading of steel is allowed by virtue of the wording of condition (ii), this will be discussed further in this report.

Development Proposals

Section 3

Spray Booth

- 3.1 The proposal is to retain the spray booth to the front of the unit which is used to prime the steel prior to delivery off site.
- 3.2 Not all steel is primed, but some customers request this.

Storage of Steel on parking area

- 3.3 The applicant prepares and cuts the steel and undertakes any fabrication within the main industrial unit.
- 3.4 It is not possible to easily load the steel onto lorries inside the unit and nor would this be safe (because of exhaust fumes, vehicles manouevering, restricted access etc.).
- 3.5 The cut and formed steel are then brought outside by forklift, sprayed and primed (where required), and then placed on the car parking area to be loaded onto the lorries by forklift for delivery that day.
- 3.6 The steel is not left on the parking areas overnight, it is only placed there to enable loading straight onto the lorry.

Lorry Parking

- 3.7 At the end of the day when the lorries return, they are placed inside the unit for security reasons.

Planning Policy Framework

Section 4

- 4.1 Statutory guidance and development plan policies have been important considerations in the preparation of the proposal and details of the relevant guidance against which the application falls to be considered are set out below. The implications of these policies and other material considerations are addressed in section 5 of this statement, which sets out our planning case.

Development Plan Policy

- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The Development Plan for the application site consists of the Gravesham Local Plan Core Strategy (2014) and the Local Plan 1st Review (1994)

Gravesham Local Plan Core Strategy (2014)

- 4.4 The Core Strategy (hereafter LPCS) was adopted in 2014 and sets out the Council's strategic policies and proposals for the development and use of land within the Borough up to the period of March 2028.
- 4.5 The following policies are relevant in the context of this proposal and are considered in further detail in section 5 of this statement:

Policy CS01 Sustainable Development	This policy merely reaffirms the application of the approach to sustainable development as set out in the Framework.
Policy CS03 Northfleet Embankment and Swanscombe Peninsula East Opportunity Area	A key policy for this specific area in relation to the strategic objectives of S01 above.
Policy CS18 Climate Change	This policy sets out several issues and procedures that developments need to address and confirm to reduce the impacts of climate change. The Council will require the use of Sustainable Urban Drainage Systems on all developments where technically and financially feasible
Policy CS19 Development and Design Principles	This states that new development will be visually attractive, fit for purpose and locally distinctive. It also states that development should conserve and enhance the character of the local built, historic, and natural environments, integrate well with the surrounding local area, and meet anti-crime standards.

Policy CS07 Economy, Employment and Skills	This states that the Council will support the refurbishment and upgrading of existing industrial and commercial premises, amongst other things.
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- 4.6 In accordance with the provisions of the Framework, a strategic review of the CS was undertaken in September 2019.
- 4.7 The review confirmed that policy CS02 would require modification to reflect the objectively assessed development needs noting that to review the development strategy and green belt boundaries requires assessment through the plan making process.
- 4.8 The review considered that although policy CS12 was slightly out of conformity with the Framework in that it now requires net gains in biodiversity there was no requirement to modify the policy as the Framework is a material consideration.

Gravesham Local Plan 1st Review (1994)

- 4.9 The Local Plan 1st Review (LP) was adopted in 1994 and many of its policies were saved until subsequently superseded by the LPCS. There are no policies in the Local Plan relevant to this application.

Material Considerations

National Planning Policy Framework

- 4.10 In December 2024, the Government published the revised National Planning Policy Framework (the 'Framework') which sets out its objectives for securing sustainable economic growth.

Presumption in favour of sustainable development

- 4.11 At the heart of the revised Framework is a presumption in favour of sustainable development, encompassing social, economic, and environmental roles. The approach to sustainable development involves making the necessary decisions now to realise the vision of stimulating economic growth, maximising wellbeing, and protecting our environment, without negatively impacting on the ability of future generations to do the same. Paragraph 8 of the Framework states that under this approach, planning is expected to deliver:
- a strong, flexible, and sustainable economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision

of infrastructure (Economic role);

- protection and enhancement of our natural, built, and historic environment, prudent use of natural resources and actions to mitigate and adapt to climate change, including moving to a low carbon economy (Environmental role);
- strong, vibrant, and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality-built environment, with accessible local services, that reflects community needs and supports well-being (Social role).

- 4.12 Paragraph 11 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. Footnote 6 confirms that designated heritage assets are one of the criteria that may provide a clear reason to refuse a development.
- 4.13 Paragraph 12 further states that developments that accord with an up-to-date local plan should be approved and those that conflict should be refused unless material considerations indicate otherwise.
- 4.14 Paragraph 39 reaffirms that decision makers should seek to approve applications for sustainable development wherever possible.
- 4.15 Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*
- 4.16 Paragraph 110 states that Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 4.17 Paragraph 112 goes on to say that if setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport.
- 4.18 Paragraph 113 states that Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling

justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

- 4.19 Chapter 14 deals with meeting the challenge of climate change, flooding and coastal change. Paragraph 176 is relevant as the site is within a flood risk zone, this states that applications for some minor development and changes of use⁶² should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote ⁶³

Planning Assessment

Section 5

- 5.1 This section of the statement provides a justification for the proposal having regard to the relevant planning policy background, the character of the local area and the site's planning history.

Principle of Development

- 5.2 The application site is within an identified employment zone and the proposals do not result in the loss of any employment provision. Accordingly, there is no objection in principle to the proposals given that they do not impact on the employment provision and indeed assist in improved longer term operational matters for the applicant on this site.

Design and Layout

- 5.3 In respect of location of the spray booth system, this is a temporary structure, and the location considered has been deemed the most appropriate location. This is because the booth is not actually located on an area identified for parking and will not affect the parking layout. It is the most appropriate location for the business operation being outside and near the main set of warehouse doors, which allows for the steel to be easily taken outside and primed where required, before being moved for loading onto the lorries.

Amenity impacts

- 5.4 Due to the location of the proposed spray booth, it will not be visible from any residential property, the nearest being in Pier Road to the west and screened from view by the building itself. It is accepted that visually the spray booth is not particularly appealing, but consideration would be given to cladding the exterior if required. There are also other units in the vicinity that have also added external plant which have been permitted (such as Leading Edge Labels who have an external compactor).

Noise considerations

- 5.5 Given the location of the site there are no residential properties that would be impacted because of the extractors associated with the spray booth. The spray booth has been here since 2022 and as far as we are aware there have been no complaints relating to it.

Highway impacts

- 5.6 The parking area to the front of the site was identified on the approved plans and protected by a planning condition that states:

(iii) "The area shown on the submitted plan as vehicle parking, loading, off-loading and manoeuvring space shall be used for or kept available for such a use at all times when the premises are in use, and no development whether or not permitted by the Town and Country Planning General Development Order 1988 (as amended), shall be carried out on that area of land or in such a position as to preclude vehicular access to this reserved vehicle parking, loading, off-loading and manoeuvring space."

- 5.7 Use of the forecourt area is allowed for loading and off-loading as set out in the condition. As part of their operation Mah steel places the steel on the forecourt to enable the lorries to be correctly loaded. Steel is not left here for any long periods of time and certainly not overnight.
- 5.8 The areas identified for the overnight parking of lorries are kept available for such use overnight, but the lorries are parked inside the unit because of the risk of theft or vandalism.
- 5.9 16 vehicle spaces remain available for the unit as shown on the proposed plans and being spaces 37 to 52. The 53rd space shown on the originally approved plans appears never to have been constructed.
- 5.10 The application is accompanied by a Transport Statement undertaken by Stantec. The report confirms the approved parking situation and the current method of working which has resulted in steel being stored on part of the loading and unloading area.
- 5.11 Reference is made to the parking standards for non-residential uses in Gravesham as well as the Kent standards, It is noted that Kent standard is a single maximum value of 1 space per 50m² for the type of occupier as MAH Steel.
- 5.12 Of the 45 permitted car parking spaces, a total of 18 are typically available for use by staff parking on a day to day basis. MAH have advised that the 18 spaces available are spaces 30 to 45 (inclusive) at the east end of the forecourt plus 2 spaces are used at the end of these rows, effectively as on street parking.
- 5.13 A total of 38 staff currently work and are based at the site, and the applicant has advised that staff currently travel to work using various modes. Some staff car share, some staff use public transport, some used motorcycles and some use bicycles (which

are stored inside during the day. Of the 38 staff based on site 24 of these typically drive to work and of the 24 staff that drive to work, there will typically be absentees each day due to annual leave or illness or working / visiting elsewhere. Hence, parking demand is typically lower. In addition, shift working is undertaken, on this basis, it would be expected that a maximum of 6 staff members that drive to work would need to park off site.

- 5.14 There are other on street parking spaces available in the vicinity and these have been used by staff for a number of years. It is proposed therefore that the provision of 18 car parking spaces on site would continue for the duration that MAH Steel occupies the building. On vacating the building MAH Steel intend to reinstate the parking provision of 45 spaces as per the current permission, ready for a new occupier.

Flood Risk

- 5.15 Part of the site is within a flood zone as shown on the extract below:



Figure 1 – Environment Agency's 'Flood Map for Planning' (from .gov website).

- 5.16 A flood risk assessment has been prepared to support the planning application which appraises the risk of flooding from all sources, e.g., sewers, groundwater, surface water, artificial sources, reservoirs, tidal, fluvial and pluvial sources. Using site specific flood data this has quantified the risk of flooding at the site for a range of extreme storm events and assessed the potential impact flooding could have on the proposed development.
- 5.17 The report concludes that when the impact of climate change is considered, the overall risk of flooding from the sea is considered to be low, from surface water is considered

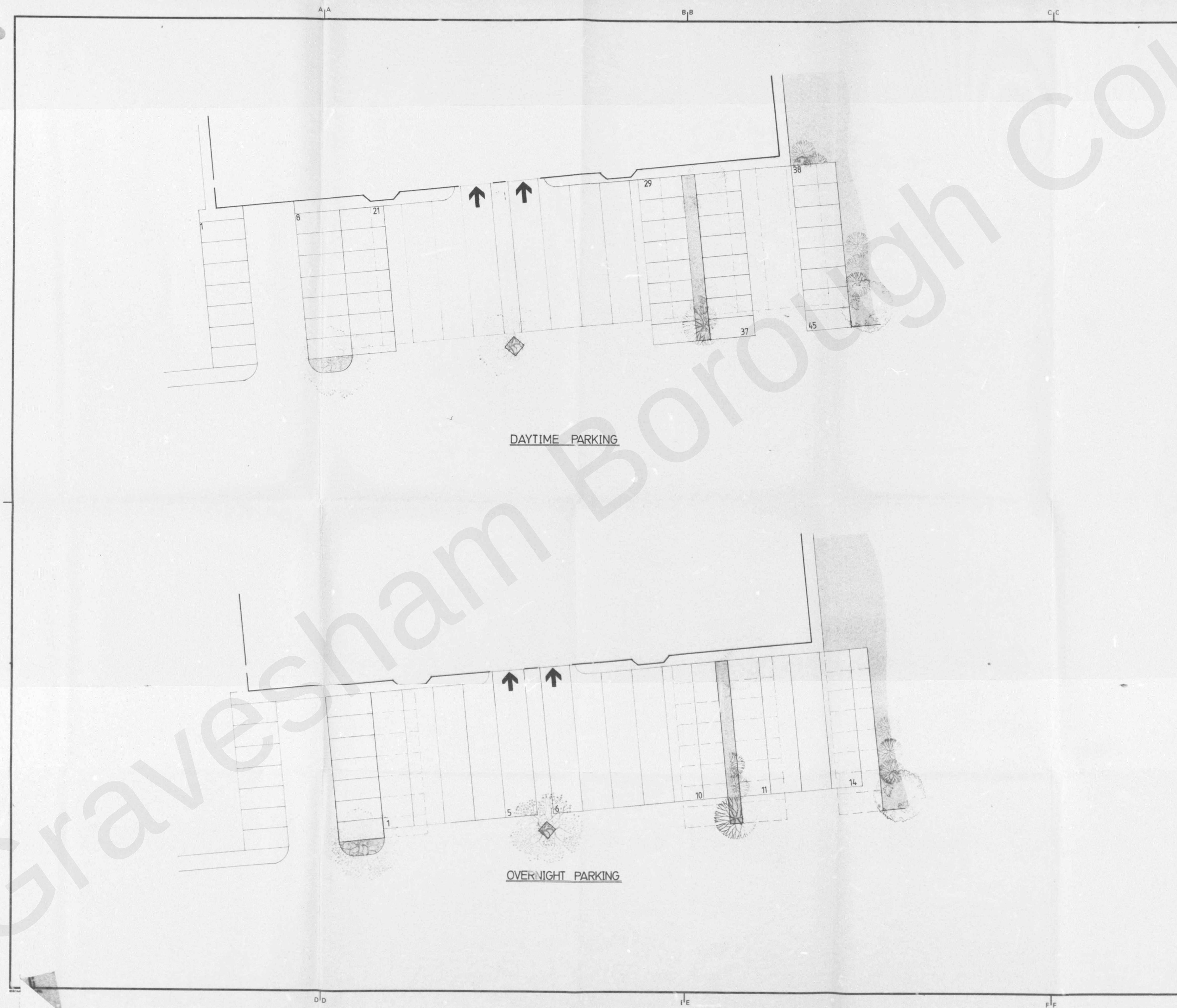
to be low, from groundwater is considered to be low and from sewers is considered to be low. Reservoirs, canals and other artificial sources are considered to be low.

- 5.18 In terms of flooding from the tidal reaches of the River Thames, the development site benefits from existing defence infrastructure along the River Thames, which provides A 1 in 1000 year standard of protection. It is anticipated that by 2100, the tidal walls along both banks of the river will be raised to a minimum of 7.4 metres a AODN in this area of the River Thames, therefore the site would be protected by the defences and would continue to remain dry in the future, the actual risk of flooding to the site is concluded to be low.
- 5.19 In the event of a breach the flood water is expected to reach a maximum depth of 0.45 metres within the red line boundary, and a depth of 0.07 metres within the spray booth location itself.
- 5.20 Considering the high standard of protection provided by defences, the good condition they are maintained to, and the low probability of their failure, it is considered that the likelihood of these defences failing over the lifetime of the development is very low. Nevertheless, it is recommended that in anticipation of a breach event, the occupants of the building should sign up to the EA's early flood warning system to enable the users of the site to be on high alert and to evacuate the building before the shallow floodwater reaches the site.
- 5.21 The report concludes that the development will meet the requirements of the national planning policy framework

Conclusion

Section 6

- 6.1 MAH Steel is a well-established business running in Gravesend and supporting the wider southeast region in supplying steel for construction projects which in turn benefit the local economy.
- 6.2 The site has operated its current parking regime for several years, certainly since November 2022 and had no complaints whatsoever. It is only recently that some parking by employees on the road apparently caused a neighbouring business to object.
- 6.3 Much of the area used for steel storage is identified for the daytime and nighttime parking of lorries and for the loading and off-loading. The steel is placed on this area for loading and is not stored overnight.
- 6.4 The use of the site is specific to MAH steel and the operations that it carries out, it is required to move steel from inside the unit to outside, place it on the ground and then load it onto the lorries for delivery. Whilst this storage may have resulted in the loss of some vehicle parking spaces, that is not causing a particular deficit to the employee vehicle spaces that are required for the business to operate.
- 6.5 If MAH steel were to relocate, the area identified for vehicle parking, loading and off-loading and manoeuvring would remain and be available for any future operator.
- 6.6 It is considered that the use of the site by MAH steel does not result in any parking that is detrimental to the safe operation of the site or such that conflicts are created on the adjacent highway network. Additional street parking is available in the vicinity and parking restrictions (double yellow lines on junctions etc.) are in force to enable the enforcement of any non-compliant parking.
- 6.7 MAH Steel certainly has more on-site parking than other operators that have removed all their parking by virtue of external storage (such as Howdens).
- 6.8 For all the above reasons it is considered that the proposed use of part of the parking, loading and off-loading area for steel storage prior to loading is considered acceptable and as such it is respectfully requested that planning permission be approved.



General Notes

This Drawing must not be scaled

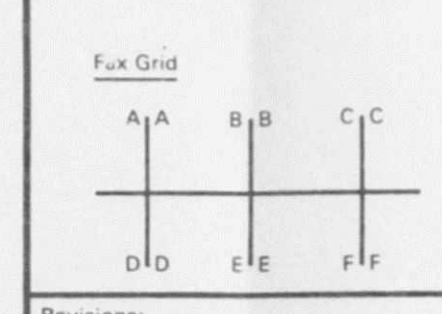
This Drawing is to be read in conjunction with drawing number

Where applicable, all dimensions are to be checked on site before any work is put in hand

All work is to conform to the current edition of Building Regulations

All materials and workmanship to conform with the relevant British Standards Specification and Codes of Practice

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Rev.	Date	Description	By
A	Apr 90	Base drawing prepared	24C

REVISED

GR90 313

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Job Title
IMPERIAL BUSINESS ESTATE GRAVESEND

Drawing Title
PARKING FACILITIES TO UNIT G1/2

Job Drawing No.
1040A/B/63

Scale 1:200

Drawn *RS*

Date
AP 90

Scale	10mm	14mm	18mm	25mm
1:50	0.2m	0.28m	0.36m	0.5m
1:100	0.4m	0.56m	0.72m	1m
1:200	0.8m	1.12m	1.44m	2m
1:500	4m	5.6m	7.2m	10m
1:1250	12m	16.8m	21.6m	30m
1:2500	24m	33.6m	43.2m	60m
1:5000	48m	67.2m	86.4m	120m
1:10000	96m	134.4m	172.8m	240m
1/4" to 1"	100m	133ft	166yards	150m
1/8" to 1"	50m	66ft	83yards	75m
1/16" to 1"	25m	33ft	41yards	37m