



Transport Statement

MAH Steel, Gravesend

1st September 2025

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Project number:
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Transport Statement**

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
01	First Issue						



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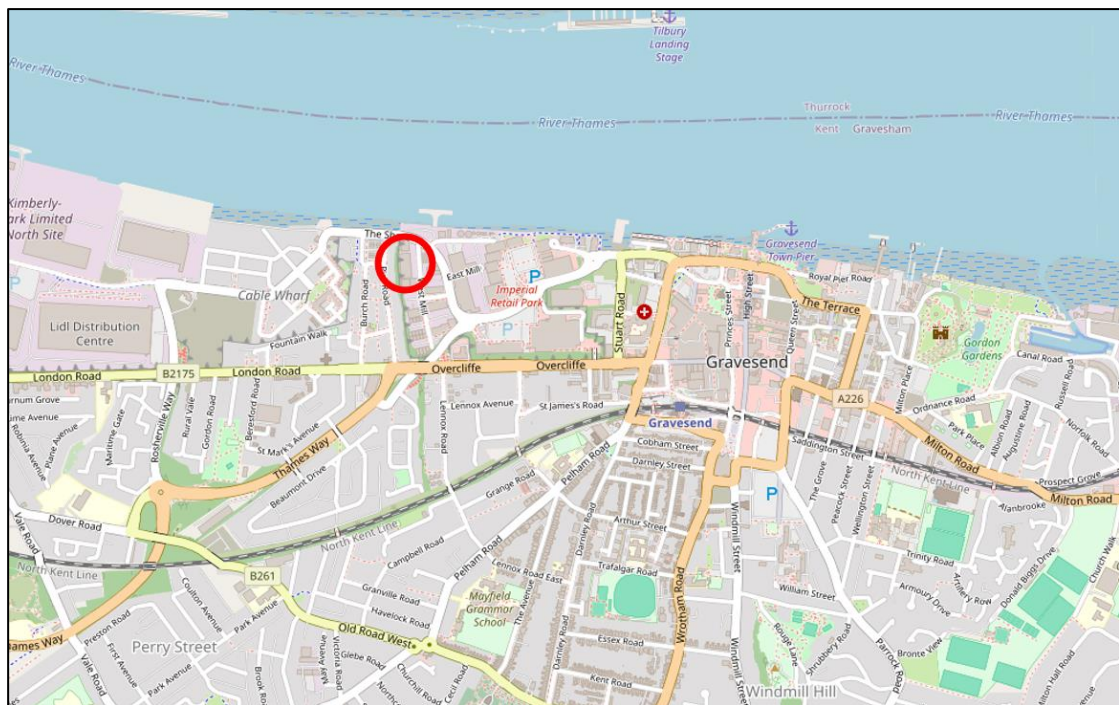
1 Introduction

1.1 Overview

- 1.1.1 Stantec UK Ltd (Stantec) have been appointed by MAH Steel (the Applicant) to provide transport planning support for a planning application to regularise the current use of the forecourt and the current layout of the parking area on site at their premises in Gravesend.

1.2 Site location

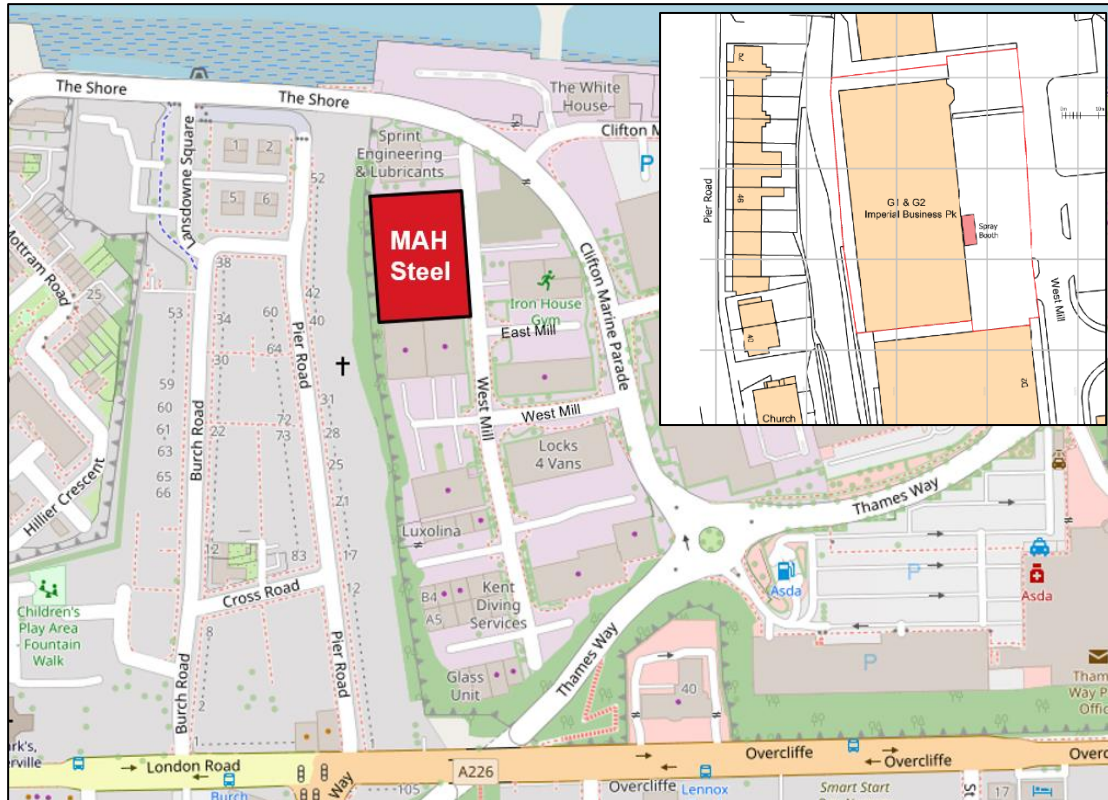
- 1.2.1 The MAH Steel site lies within the administrative planning boundary of Gravesham Borough Council (GBC) and the local highway authority is Kent County Council (KCC). The nearest strategic trunk road is the A2 which runs east west to the south of Gravesend, some 4km drive from the site, and this is managed by National Highways.
- 1.2.2 The location of the MAH Steel site is shown in the figures below. The building lies on the west side of West Mill within the Imperial Business Park located on the west side of Gravesend.



- 1.2.3 The site is bound by an industrial unit on its north boundary, trade counter retail to the south, screening and residential to the west and West Mill and other industrial units to the east as illustrated below.
- 1.2.4 Access to Imperial Business Park is via a roundabout on Thames Way whereby vehicles enter Clifton Marine Parade and head north. Clifton Marine Parade is a wide single carriageway designed for large vehicles commensurate with an industrial use. On Street parking is permitted along the majority of the east side of Clifton Marine Parade.
- 1.2.5 West Mill leads west from Clifton Marine Parade and provides further on street parking within a layby on the south side of the carriageway. West Mill continues west and then forms a north south oriented single carriageway that provides direct access to a number of industrial units and business premises. On street parking is not restricted on West Mill for much of its length.
- 1.2.6 Access to MAH Steel is taken directly from West Mill, whereby the front forecourt / yard presents an open frontage to the carriageway to access on site parking.



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1.3 This report

1.3.1 This report comprises the following sections:

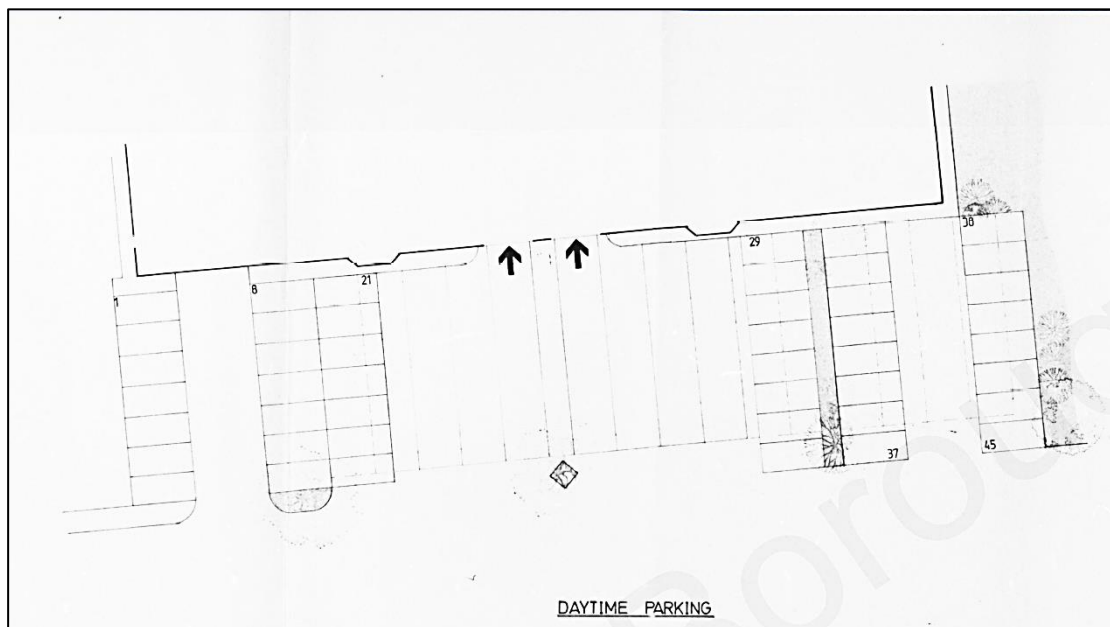
- Section 2: Planning permission and context – this provides a review of the planning context for the site.
- Section 3: Current and proposed operation – this provides a brief overview of current operations on site and the proposed operations.
- Section 4: Summary – this provides a summary to this report.



2 Planning context

2.1 Extant permission

- 2.1.1 A planning application was submitted in April 1990 for construction of the building and given reference number 19900313. Drawings submitted with the planning application indicate a floor area of 1,693m² of warehouse / industrial floorspace plus 594m² office floorspace, a combined floor area of 2,287m². This floor area is spread across the ground floor and smaller first and second floors.
- 2.1.2 Based upon further documents downloaded from the Gravesham Borough Council website permission 19900313 includes drawing 1040A/B/63A showing the parking layout.
- 2.1.3 Drawing 1040A/B/63A is labelled a “revised plan” and shows 45 car parking spaces and 7 lorry parking spaces (daytime). An extract from this drawing is shown below. Drawing 1040A/B/63A is referred to by the planning permission.



- 2.1.4 The planning permission relates to a description as follows:

“erection of a single storey building to form industrial / warehouse with ancillary offices at ground, first and second floors together with the layout of ancillary parking provisions for 45 cars and 7 lorry spaces (in substitution of units G1 and G2 previously permitted under Ref GR/89/368W) referred to in your application for permission for development dated the 25th day of April 1990 as amended by applicants’ letter dated 24.4.90 and revised drawings 1040A/B/4/1/C & B/4/61/4 & B4/64 & B/63/A & B4/2/C together with letter dated 17.5.90 and revised drawing B/4/61/E subject to the conditions specified hereunder:”

(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.”

- 2.1.5 Hence, the wording of the extant permission requires the parking shown in the above drawing extract to be available during all times when the building is in use.



2.2 Gravesham Borough Council correspondence

2.2.1 It is understood that GBC officers met representatives of MAH Steel during November 2024 to discuss existing operations on site and thereafter advised the Planning Authority's position with respect to the existing use of the car park and loading area.

2.2.2 GBC officers note that

"Currently the hardstanding area is being used for the open storage of fabricated metal structural items and treatment of these from a spray booth, including extractors which is situated against the front (east) elevation of the building. There are some parking bays available in an area south of front (east) elevation.

The current 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 19900313 and is unauthorised. It was established during our conversation that the unauthorised use has been occurring for less than ten years (breach of the condition) and four years (unauthorised development – spray booth) and therefore is not immune from enforcement under Sec 171B of the Town and Country Planning Act 1990 (as amended)

In order to make consideration of retaining the unauthorised open storage and retention of the spray booth, including extraction equipment you will need to urgently submit a planning application or otherwise remove the unauthorised uses within a reasonable and definitive time scale. As discussed, any application will need to be supported by a travel plan showing how the loss of the loading/parking area will be offset and credibly managed across the wider area."

2.3 Current parking standards

2.3.1 Reference has been made to the parking standards for non residential uses in Gravesham. The current Local Plan references the document "SPG4: Kent Vehicle Parking Standards". Maximum parking standards for land use class "B2: General Industrial" have been referred to. An extract from SPG4 is provided below.

Land Use Class B2: General Industrial

52. Use Class B2 covers development of any size to accommodate industrial processes which do not meet the residential amenity test of Use Class B1. PPG13 and regional policy do not set a standard for such development. The Kent standard is a single maximum value of 1 space per 50 m² but should be applied with discretion to industrial premises that will demonstrate a high employee density, comparable, for example, with B1 High Tech and research.

Maximum Goods Vehicle & Car Parking Standards

	Goods vehicles	Car parking
Up to 200m ²	see Note 1	3 spaces
Over 200m ²	1 space per 200m ²	1 space per 50m ²
Notes	1. Adequate facilities should be provided to enable delivery vehicles to park and manoeuvre clear of the public highway. 2. For large developments the provision for goods vehicles only applies up to a maximum of 6 spaces. For sites where more provision is required, a minimum of 6 spaces should be provided with the actual number being determined by consideration of the operational requirements and demonstrated through a Transport Assessment.	



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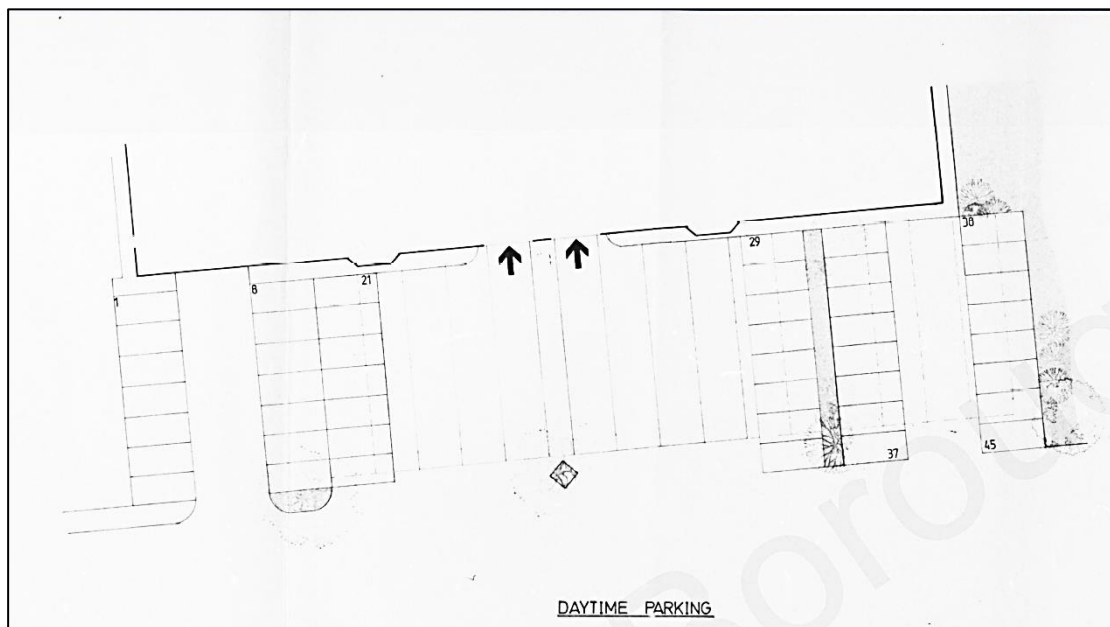
- 2.3.2 It is noted that Kent standard is a single maximum value of 1 space per 50m² for the type of occupier as MAH Steel.
- 2.3.3 On the basis of a floor area of 2,287m², a maximum parking provision of $2,287 / 50 = 46$ spaces would be permitted. The permitted 45 spaces therefore falls within this maximum.
- 2.3.4 However, it is noted that 46 spaces would be a maximum permitted, notwithstanding the comment about high density employment use. The 46 spaces is therefore not a requirement.
- 2.3.5 It is therefore assumed that parking provision could be proposed lower than the maximum of 46 were a planning application for this site to come forward now. The acceptance of a lower parking provision would presumably be based upon the discretion of highway and planning officers based upon information submitted with any planning application.



3 Current and proposed operations

3.1 Current operation

- 3.1.1 MAH Steel is a structural steel fabrication specialist based in Gravesend, Kent. The company fabricates structural and architectural steel to commercial and domestic sectors. The MAH premises holds a stock of structural steel and steel products, ready to adapt into bespoke steel products.
- 3.1.2 The premises are based in Unit G1-G2 of the Imperial Business Park. It is an industrial warehouse style building with ancillary offices, spread across a ground, first and second floor levels. The planning permission included provision for 45 car parking spaces in front of the building along with 7 lorry parking spaces.
- 3.1.3 The permitted car parking layout is illustrated by the extract below. This is taken from drawing 1040A/B/63A and shows 45 car parking spaces and 7 lorry parking spaces (daytime).



- 3.1.4 However, the existing operations on site do not utilise the parking layout as set out above. With respect to the current use and operations on site, Stantec have been advised by MAH Steel as follows:
- MAH Steel have been on site for 6 years and operating in the same way without issue.
 - 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.
 - The remaining 27 permitted parking spaces and 7 lorry parking spaces are typically used for storage of steel components. This space is currently being used for daily storage before the steel is loaded onto lorries in the evening. No fabricating occurs outside.
 - The front yard area is being used as there is insufficient room inside to organise the approximately 25 separate orders each day. This arrangement has occurred since MAH Steel have occupied the site without issue.



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- A spray booth is also located on the forecourt and this is illustrated by the drawing extracts below.



- A total of 38 staff currently work and are based at the site.
- MAH have 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 at the site, 24 of these will typically drive to work and therefore need to park.
- 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 than 24 spaces.
- The typical work patterns on site are as listed below.
 - 5am to 2pm
 - 6am to 4pm
 - 7:30am to 5:30pm



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- On this basis, it would be expected that a maximum of 6 staff members that drive to work would need to park off site.
- MAH have advised that previously, a number of staff have parked in areas signed as parking for a neighbouring company. However, it is MAH's understanding that the spaces previously used by MAH staff are intended for public parking. Nevertheless, MAH staff no longer park in those spaces.
- There are on street parking opportunities elsewhere within the industrial estate, albeit slightly further away from the MAH unit. These are on Clifton Marine Parade and West Mill.

3.2 Proposed operation

3.2.1 It is proposed that the planning application would allow MAH Steel to reconfigure their parking layout as follows:

- A total of 18 parking spaces to be provided on site to accommodate the majority of typical staff members who drive to work on a day to day basis.
- 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.
- Residual parking demand (around 6 spaces) would need to be met off site, within the surrounding on street parking of the industrial estate.
- 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.



4 Summary

- 4.1.1 Stantec have been appointed by MAH Steel to provide transport planning support for a planning application to regularise the current use of the forecourt and the current layout of the parking area on site at their premises in Gravesend.
- 4.1.2 The location of the MAH Steel site is on the west side of West Mill within the Imperial Business Park. The MAH Steel site lies within the administrative planning boundary of GBC. The local highway authority is KCC and the nearest strategic trunk road is the A2 some 4km drive from the site
- 4.1.3 Access to Imperial Business Park is via a roundabout on Thames Way. On Street parking is permitted along the majority of the east side of Clifton Marine Parade. On street parking is not restricted on West Mill for much of its length. Access to MAH Steel is taken directly from West Mill, whereby the front forecourt / yard presents an open frontage to the carriageway.
- 4.1.4 A planning application was submitted in April 1990 for construction of the building and 45 car parking spaces and 7 lorry parking spaces (daytime). The extant permission requires the parking permitted to be available during all times when the building is in use.
- 4.1.5 GBC officers note that the current use of the car park / loading area for open storage and spray treatment in the booth is in breach of the permission. They have advised that a planning application would need to be submitted and approved to regularise this use.
- 4.1.6 The current Local Plan references the document "SPG4: Kent Vehicle Parking Standards". Maximum parking standards for land use class "B2: General Industrial" have been referred to. It is noted that Kent standard is a single maximum value of 1 space per 50m² for the type of occupier as MAH Steel.
- 4.1.7 On the basis of a floor area of 2,287m², a maximum parking provision of $2,287 / 50 = 46$ spaces would be the permitted maximum, but is not a minimum requirement.
- 4.1.8 It is therefore assumed that parking provision could be proposed lower than the maximum of 46 were a planning application for this site to come forward now. The acceptance of a lower parking provision would presumably be based upon the discretion of highway and planning officers based upon information submitted with any planning application.
- 4.1.9 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. The remaining 27 permitted parking spaces and 7 lorry parking spaces are typically used for storage of steel components.
- 4.1.10 A total of 38 staff currently work and are based at the site. MAH have advised that staff currently travel to work using various modes and of the 38 staff based at the site, 24 of these will typically drive to work and therefore need to park. 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 than 24 spaces. On this basis, it would be expected that a maximum of 6 staff members that drive to work would need to park off site.
- 4.1.11 There are on street parking opportunities elsewhere within the industrial estate, albeit slightly further away from the MAH unit. These are on Clifton Marine Parade and West Mill.
- 4.1.12 It is proposed that the planning application would allow MAH Steel to reconfigure their parking layout and provide a total of 18 parking spaces on site, with residual parking demand being met off site.
- 4.1.13 It is proposed that this arrangement 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.

