

**To:** Shiv Singh

**From:** Jeremy Smith

**Company:** Wates Developments Ltd

**SLR Consulting Limited**

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**Project No.** 403.065049.00001

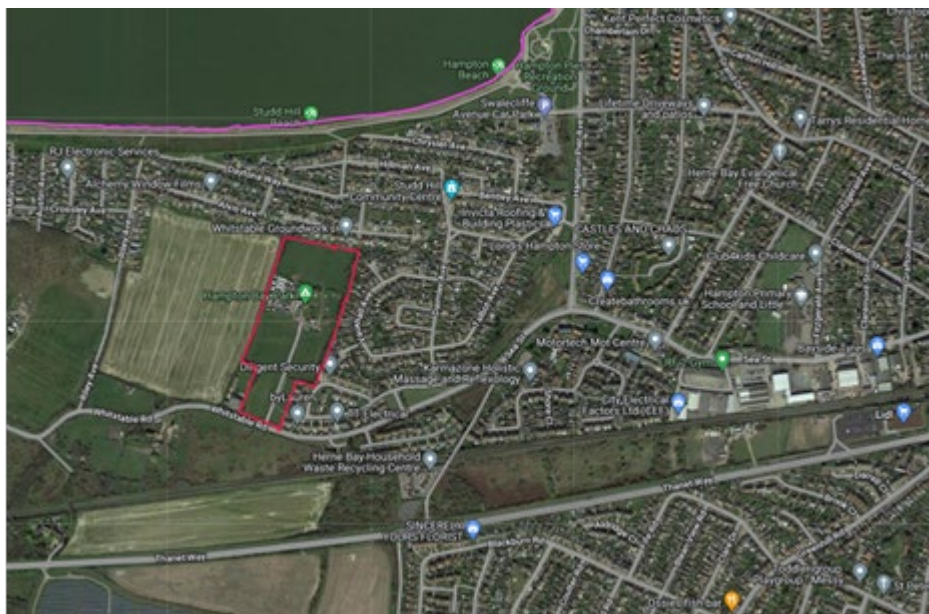
**RE: Whitstable Road, Harne Bay**  
**Desktop Landscape Appraisal of Green Gap Rev1**

## 1.0 Objectives

SLR Consulting Limited (SLR) was instructed by Shiv Singh of Wates Developments Limited (Wates) to undertake a preliminary landscape appraisal of a proposed residential site within a Green Gap designation at Whitstable Road, Herne Bay. In particular, Wates is seeking an opinion on whether development in this location could be feasible in landscape and visual terms, notwithstanding the gap designation.

This preliminary report does not seek to provide a landscape and visual appraisal of the proposals, but instead focuses upon the potential effects of development upon the functionality of the gap between Herne Bay and Whitstable.

The location of the site is shown on **Plate I**, below.



**Plate I: Location of Proposed site at Whitstable Road, Herne Bay**

## 2.0 Methodology

This report is based upon a desk top assessment of Local Plan policies, character assessments and maps.

Strategic and Local Gaps (sometimes also known as Green Gaps or Green Wedges) are used by many planning authorities to ensure that settlements retain their separate identities. The precise wording of policies relating to strategic gaps varies, but many have now converged on a set of fundamental principles, underpinned by research and Appeal Decisions.

One of the most quoted research documents regarding the functionality of strategic gaps was prepared for the Office of the Deputy Prime Minister (*“Strategic Gap and Green Wedge Policies in Structure Plans, Main Report”*, ODPM, 2003). This review notes that many authorities accept that the robustness of a gap depends on much more than the physical distance between settlements, or visibility between settlements. For example, in 1998 the Inspector on the Eastleigh Local Plan Inquiry stated that the following factors (often known as the Eastleigh Criteria) should be used to define the effectiveness of a gap (see paragraph 4.15 of the ODPM report):

- Distance;
- Topography;
- Landscape character/type;
- Vegetation;
- Existing uses and density of buildings;
- Nature of urban edges;
- Inter-visibility (the ability to see one edge from another);
- Intra-visibility (the ability to see both edges from a single point);
- The sense of leaving a place [and arriving somewhere else].

Careful application of the Eastleigh Criteria means that the gaps between settlements will vary in their size and character – some may be over a kilometre wide and others just a few hundred metres – the key is whether the factors above work together to maintain a perception of separation between the settlements. Equally importantly, the careful application of the Eastleigh criteria means that some development within a designated gap could be possible, provided that the sense of separation between settlements is not undermined.

This approach has been confirmed in various Policy frameworks including: The Policy Framework for Gaps produced by the Partnership for Urban South Hampshire (known as PUSH, produced in 2008), The Fareham Landscape Assessment 2017 (LDA) and Core Strategy (adopted 2011), the Horsham District Planning Framework (adopted 2015), the Basingstoke and Deane topic paper on the function of strategic gaps (2014) and resulting strategic gap policy and Tonbridge and Malling Local Plan policy CP5.

### 3.0 Planning Policy Context

In the Canterbury District Local Plan (2017) the site is located at the eastern edge of a Green Gap.

Policy OS6 states that:

*“Within the Green Gaps identified on the Proposals Map ... development will be permitted where it does not:*

*a. Significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements;*

*b. Result in new isolated and obtrusive development within the Green Gap”*

Policy OS7 relates more specifically to the gap between Herne Bay and Whitstable:

*“Within the Herne Bay and Whitstable Green Gap identified on the Proposals Map ... development will be permitted where it does not:*

*a. Result in a material expansion of the built up confines of the urban areas of Herne Bay or Whitstable; or*



*b. Significantly affect the open character or separating function of the Green Gap; and c. Result in new isolated development within the Green Gap”*

In the Canterbury District Draft Local Plan Reg 19 (March 2026) the site remains located at the eastern edge of a Green Gap.

Policy DS22 states that:

*“Within the designated Green Gaps, as defined on the Policies Map, only proposals for sports and recreation uses, blue and green infrastructure, renewable and low carbon energy, and publicly accessible open space will be permitted, and only where the development:*

- a. Does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements; and*
- b. Ensures the built form is kept to the minimum necessary to support the proposed use; and*
- c. Is sensitively designed, including in terms of form and lighting; and*
- d. Is sensitively located and does not result in isolated and obtrusive development.*

*Proposals for development within the Herne Bay and Whitstable Green Gap will be subject to the criteria above, however education or outdoor leisure may also be considered as suitable uses. Any proposal must not result in a material expansion of the built confines of the Urban Areas of Herne Bay or Whitstable.”*

The site is not within a landscape designation, nor are there any other landscape-related designations within or around the site. The site is not publicly accessible.

## **4.0 Landscape and Visual Context of the Site**

The site is currently a campsite (Hampton Bay Park) adjacent to open grassland fields contained by mature hedgerows. Residential areas of Herne Bay extend along the eastern and northern edges of the site, and also along the north-western edge of the site. A single property is also located to the south-west of the site. The B2205 runs along the southern edge of the site. The properties around the site are largely bungalows, although they are visible across the site and consequently give a strong sense that the site is on the settlement edge.

The site slopes gently towards the east and is at an elevation of approximately 10m AOD. There is a low ridge of land to the west of the site (c15m AOD).

There are clear views of the site from Whitstable Road to the south of the site, and from neighbouring properties. The potential for wider views appears to be limited.

## **5.0 Evaluation of the Existing Gap and the Potential Effects of Residential Development upon the Functionality of the Gap**

The site is located to the south of Studd Hill, which is a residential neighbourhood within Herne Bay. Studd Hill extends further south than the boundaries of the site, and also further to the west. The narrowest part of the Green Gap between Studd Hill and Swalecliffe (which is a residential neighbourhood of Whitstable) is approximately 440m, although this gap is partly occupied by static caravan parks which create a sense of visual coalescence between the two settlements.

The main routes linking the settlements – and thus two of the main ways in which the separate identities of the settlements can be experienced – are Whitstable Road (B2205) to the south of the site, (distance approximately 890m) and the Saxon Shore Way to the north, a recreational route and regional trail along the coast (distance approximately 1km). However, the most direct pedestrian/cycle route between the two settlements is a byway leading from



the western edge of Studd Hill, through the caravan park, to the eastern edge of Swalecliffe (approximately 615m). There is also a byway to the west of the site which links Studd Hill with the Whitstable Road.

Importantly, development of the site would not affect the sense of leaving one settlement, travelling through an intermediate landscape, and arriving somewhere else. There would be no reduction to the distance of the narrowest part of the gap, and no change to the journey on the Saxon Shore Way or on the byway which provides the shortest route between the settlements. The only route which would undergo a slight change in experience would be on the Whitstable Road, since approximately 75m of site frontage could be filled with built form which forms approximately 8% of the total journey distance between the settlements along this route. However, this would still leave a significant area of open landscape along this road of over 800 metres, which would certainly still provide the sense of leaving one place and arriving somewhere else.

In summary development on this site would not *significantly* affect the open character of the green gap, nor would it lead to a sense of coalescence. Nor would development here *significantly* result in the material expansion of the built-up areas in the locality of the Green Gap, *significantly* affect the open character of the gap, or result in isolated development.

I have concluded that development of this site would still allow the Green Gap to function fully and could be consistent with policies OS6 and OS7. Whilst the proposed development would not be of entirely “*sports and recreation uses, blue and green infrastructure, renewable and low carbon energy, and publicly accessible open space*” as set out in Draft policy DS22, it would adhere to the other key principles, as set out in the paragraph above.

