

**TOWN AND COUNTRY  
PLANNING ACT 1990  
FORMER HOTEL FELIX,  
WHITEHOUSE LANE,  
GIRTON, CAMBRIDGE**

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## Table of Contents

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
1.1	Background	1
1.2	Scope	1
1.3	Approach	2
1.4	Statement of Truth	3
<b>2.0</b>	<b>Review of the District Council Statement of Case</b>	<b>5</b>
<b>3.0</b>	<b>Existing Landscape and Townscape Character</b>	<b>5</b>
<b>4.0</b>	<b>Relevant Planning Policies</b>	<b>12</b>
4.2	NPPF	12
4.3	South Cambridgeshire Local Plan 2018	12
<b>5.0</b>	<b>Development Impact</b>	<b>13</b>
5.1	Green Belt Openness	13
5.2	Landscape and Townscape Impact	13
5.3	Visual Impact	15
<b>6.0</b>	<b>Committee Report</b>	<b>15</b>
<b>7.0</b>	<b>Summary and Conclusion</b>	<b>16</b>

## 1.0 Introduction

### 1.1 Background

- 1.1.1 My name is Martina Sechi. I have a Bachelor of Science in Building Engineering from the Politecnico di Milano and a Master of Art in Landscape Architecture from Writtle College, Essex University. I am a Chartered Landscape Architect and have around 11 years of professional experience. I have worked for a number of design and planning practices, and have presented on the topic of landscape assessment to post-graduate courses in UK and Italy. I have been employed at Bidwells for the last 5 years where I am Head of Landscape and Townscape Assessment within the Urban Design Studio team.
- 1.1.2 My principal area of expertise is landscape/townscape and visual impact assessment. I have carried out such assessments for a wide range of projects, including many urban residential and mixed uses schemes. I have worked on sites across England, with several projects located within Cambridge, including sites within the Green Belt such as the development at the Babraham Research Campus.
- 1.1.3 I was instructed in November 2022 to present landscape, visual and Green Belt evidence in relation to this appeal. I previously prepared the Landscape & Visual Appraisal (**LVA**) and Green Belt Study (**GBS**) that accompanied the refused planning application (see CD20).

### 1.2 Scope

- 1.2.1 This appeal relates to the following development:  
*'Demolition of existing buildings and erection of a care home (Use Class C2) with external amenity space, access, parking, landscaping and other associated works.'*<sup>1</sup>
- 1.2.2 This appeal was lodged against the decision to refuse the planning application issued the 22<sup>nd</sup> of July 2022. My evidence relates to the first reason for refusal (**RfR1**):  
*'The site is located outside of the development framework boundary of Girton, within the countryside and Cambridge Green Belt. The proposed development would represent inappropriate development that is, by definition, harmful to the Green Belt in policy terms as the development does not fall within any of the exception criteria within paragraphs 149 or 150 of the National Planning Policy Framework 2021. The proposal is therefore contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and paragraphs 147, 148, 149 and 150 of the National Planning Policy Framework 2021 that seek to resist inappropriate development in the Green Belt.'*
- 1.2.3 It is noted that the reason for refusal does not identify any issues associated with:
- landscape character and appearance;
  - views;
  - separation between settlements;
  - loss of countryside; or

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<sup>1</sup> As per Planning Application 21/00953/FUL description

- the footprint/massing of the proposed buildings.

1.2.4 Nor does the reason state precisely how the development is alleged to be harmful to the Green Belt, except '*by definition*' and '*in policy terms*', since it is considered to represent '*inappropriate development*'.

1.2.5 This proof of evidence therefore does two things. Firstly, it assesses the impact of the proposal on the openness of the Green Belt, specifically in relation to the "Girton gap"<sup>2</sup>, which is the land separating the village of Girton from the new residential-led development of Darwin Green<sup>3</sup> (see Figure 1) on the edge of Cambridge. In doing so, my proof addresses the requirements of Policy S/4 of the South of Cambridgeshire Local Plan 2018. Secondly, my proof considers whether the development is appropriate to the local landscape/townscape character and to the visual experience locally.

1.2.6 As regards Green Belt openness, I shall demonstrate that:

- The proposal would not alter the qualities of the Girton gap to the point of compromising its Green Belt function.

1.2.7 In relation to the landscape and townscape, I shall demonstrate that:

- a) The proposal would not adversely alter the local landscape and townscape qualities; and
- b) The proposal would not give rise to any physical or perceived loss of countryside.

1.2.8 In visual terms, I shall demonstrate that:

- a) The proposal would not increase the perceived influence of development along Huntington Road; and
- b) The proposal would not alter the visual composition of the views from Whitehouse Lane where the existing balance between the built and natural environment will be preserved.

1.2.9 I have focused on viewpoints from Huntington Road and Whitehouse Lane as they are the publicly accessible viewpoints that are closest to the Site, and they are representative of the visibility of the proposal within the Girton Gap.

1.2.10 Whilst I defer to Ms Melissa Magee on design matters, I endorse her evidence on the rationale of the design of the proposal and the appropriateness of the architecture proposed. Although I consider the degree to which the development complies with policies relating to landscape, visual and Green Belt matters, I defer to Mr Mike Derbyshire on associated planning matters and the planning balance.

### 1.3 Approach

1.3.1 I shall be relying on the LVA and GBS, including supporting visual representations (technical visualisations), which are re-issued as a supporting document (see CD20).

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<sup>2</sup> Sub area 1.2 in Cambridge Inner Green Belt Boundary Study (CIGBBS), LDADesign, November 2015

<sup>3</sup> The development known as Darwin Green sits within the site allocated as R43 in the Cambridge City Policy Map 2018. It will be delivered in 6 phases, with phase 1 already operational, and phase 2 and the Local Centre currently under construction (see Figure 1 below).

The scope of the assessment, including the viewpoints and methodologies, was agreed with the LPA during the pre-application engagement process.

- 1.3.2 The landscape officer commented on the planning application as follows (**emphasis added**):

*‘The findings of the Landscape and Visual Appraisal are generally acceptable. It is considered that the impact of the development on the openness of the Greenbelt is **negligible** due to the existing presence of a similarly functioning and sized building as discussed within the report.’<sup>4</sup>*

- 1.3.3 In my view, the judgment that the proposal would have a “negligible” impact on the openness of the Green Belt is not significantly different from the conclusion in the LVA and GBS that the proposal would not have a greater impact on the Green Belt’s essential quality of openness than the existing building. In his proof of evidence, Mr Mike Derbyshire considers the implications of this judgment of “negligible” impact for the overall planning balance.

- 1.3.4 The LVA was produced following relevant industry standards (namely the Landscape Institute’s guidance and notes). Technical visualisations were produced by a third-party professional in accordance with the Landscape Institute Technical Guidance Note<sup>5</sup>.

- 1.3.5 I have taken account of the relevant guidance on assessing the impact of development on openness in the UK Government’s Planning Practice Guidance. In the absence of any further professional guidance on the assessment of Green Belt qualities such as openness, I have applied my own criteria in the GBS, drawing on my experience and expertise in landscape and visual impact assessment.

## 1.4 Statement of Truth

- 1.4.1 This evidence has been prepared and is given in accordance with the guidance of the Landscape Institute.
- 1.4.2 I confirm that I have made clear which facts and matters referred to in this Proof of Evidence are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

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<sup>4</sup> Committee Report, 13 July 2022, planning reference 21/00953/FULL

<sup>5</sup> Visual Representation of Development Proposals, Landscape Institute, 17 September 2019

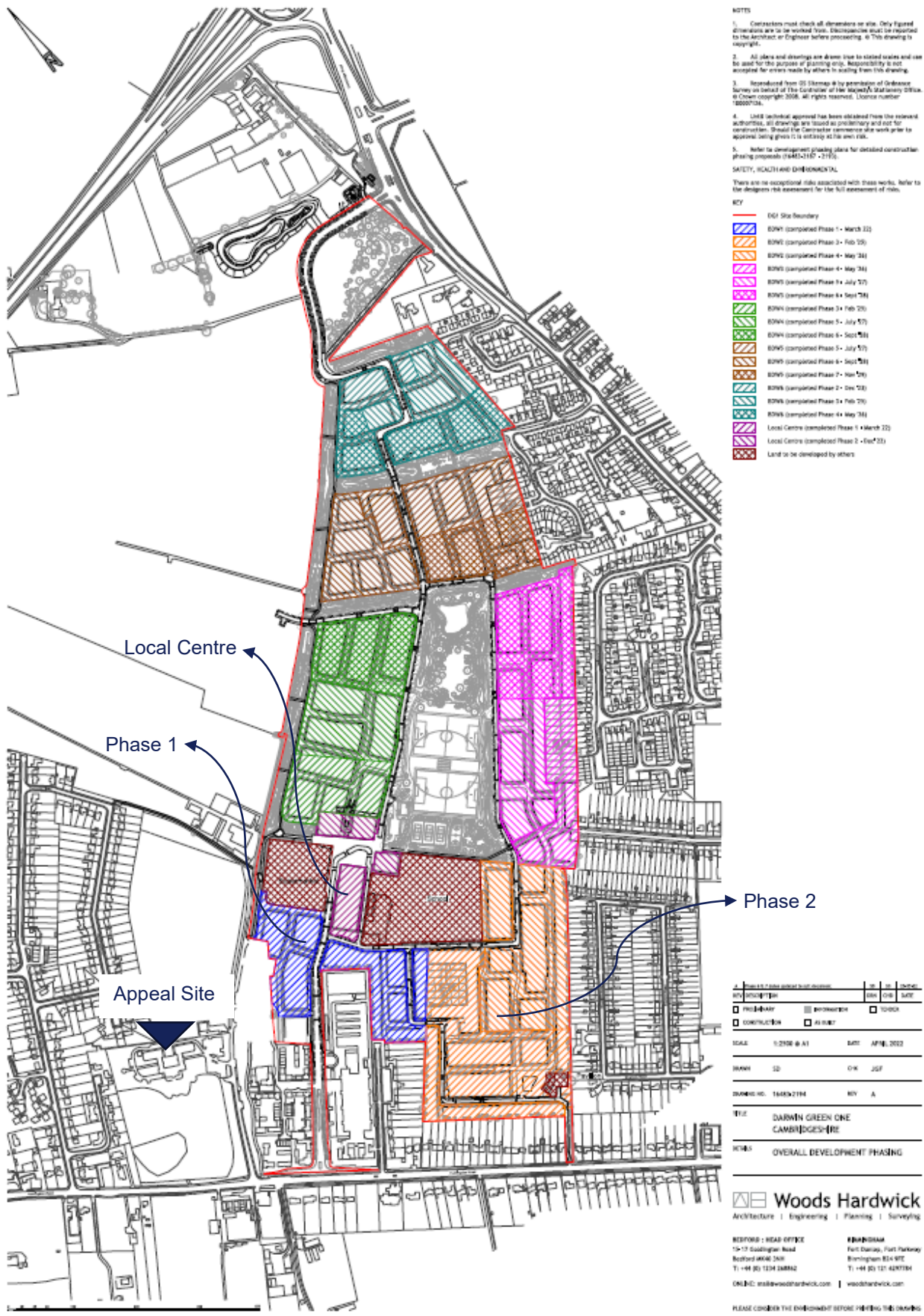


Figure 1 - Darwin Green development



## 2.0 Review of the District Council Statement of Case

- 2.1.1 The South Cambridgeshire District Council Statement of Case (SCDC SoC), dated December 2022, states in relation to RfR1 that *'the proposal would result in a degree of encroachment into the countryside'* (pg. 9 par. 5.5), which would be contrary to paragraph 138c of the NPPF.
- 2.1.2 In my view, this particular purpose of the NPPF is not relevant to the Site as it does not have rural qualities, nor does the Site contribute to the appearance and function of any countryside setting. Although the Green Belt purposes in the NPPF are a useful starting point when assessing development, I consider that the more site-specific policies and studies published by SCDC in relation to the Cambridge Green Belt are more instructive in this case.
- 2.1.3 I refer in particular to the supporting text for Policy S/4 of SCDC Local Plan 2018 (p. 25, para. 2.20), where the specific purposes of the Cambridge Green Belt are listed as:
- *'Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
  - *Maintain and enhance the quality of its setting; and*
  - *Prevent communities in the environs of Cambridge from merging into one another and with the city.'*
- 2.1.4 I also refer to the Cambridge Inner Green Belt Boundary Study ("**CIGBBS**") commissioned by SCDC and Cambridge City Council, which lists 16 qualities of the Cambridge Green Belt and associates the NPPF purpose of preventing encroachment with two of them (see table on p.59 of CIGBBS):
- Quality 9: *'A soft green edge to the city'; and*
  - Quality 16: *'A city set in a landscape which retains a strongly rural character.'*
- 2.1.5 In relation to Quality 9, the CIGBBS assessment of the Green Belt area relevant to the Site notes the importance of the vegetated character of the views towards Cambridge (see Table Sector Number:1, p. 75), which has already been altered by approved developments at Drawing Green and Eddington (Figure 4). Similarly, in relation to Quality 16 (see Table Sector Number:1, p. 79), the "rural" qualities are associated with vegetated edges, however *'the corridor of the A14 influences the area, slightly degrading the character of this sector, and future committed development is likely to further urbanise this sector, at least in the short to medium term.'* The *'future committed development'* is a reference to the western extension of Cambridge shown in Figure 4.
- 2.1.6 Finally, as illustrated in Figure 4, the perceived urban edge of Girton includes the existing building within the Site, the former Hotel Felix. In light of this, and the Site's general lack of rural qualities, I conclude that the third Green Belt purpose in the NPPF (par. 138c of the NPPF) is irrelevant in the present case and so would not be harmed by the proposal.

## 3.0 Existing Landscape and Townscape Character

- 3.1.1 The proposal is located to the west of Cambridge, between the north-west suburban fringe of Cambridge and Girton (see Figure 2). The Site currently includes the former Hotel Felix building and the associated parking area.
- 3.1.2 The fields immediately to the north and south of the Site form a green break between Girton and Cambridge. The residential areas, including the new and under-construction

developments at Darwin Green and Eddington (Figure 4), define the extent of the landscape context (see urban edges in Figure 4). To the east of Whitehouse Lane, adjacent to the Site, is Darwin Green Phase 1 (now operational), with Phase 2 and the Local Centre (Figure 1) currently under construction.

- 3.1.3 The CIGBBS is the most up to date analysis of the Cambridge Green Belt. As noted in Section 5 of the LVA and GBS (see CD20), the CIGBBS locates the Site in the landscape of the Western Fen Edge, where villages are described as retaining their individuality despite their proximity to Cambridge.
- 3.1.4 The CIGBBS subdivides the Green Belt around Cambridge into 'Sectors', which are then further subdivided into 'Sub-Areas'. The Site is located in the Girton gap, which is identified as Sub Area 1.2 of Sector 1 of the Green Belt (Figure 3).
- 3.1.5 According to the CIGBBS (par. 6.4.3, p. 79) Sector 1 *'plays a key role in the separation between the village of Girton and the existing and future edge of Cambridge, both adjacent to the Darwin Green development and in relation to the development at North West Cambridge. It also provides separation between the future edge of Cambridge and Histon and Impington. It retains open countryside close to the future edge of the city and prevents the sprawl of built development as far as the edge of Girton and the A14, retaining the distinctive approach into Cambridge from the north west along Huntingdon Road. It also preserves what remains of the separate identity of the southern part of Girton.'*
- 3.1.6 The CIGBBS also states in its assessment of Sub Area 1.2 - Girton Gap (Section Number: 1 table, p. 78): *'This sub area comprises a hotel and sports fields and does not contribute significantly to the character or rural setting of Girton.'* The 'hotel' mentioned by the CIBGGS is referring to the former Hotel Felix located within the Site.



Figure 2 - Site location



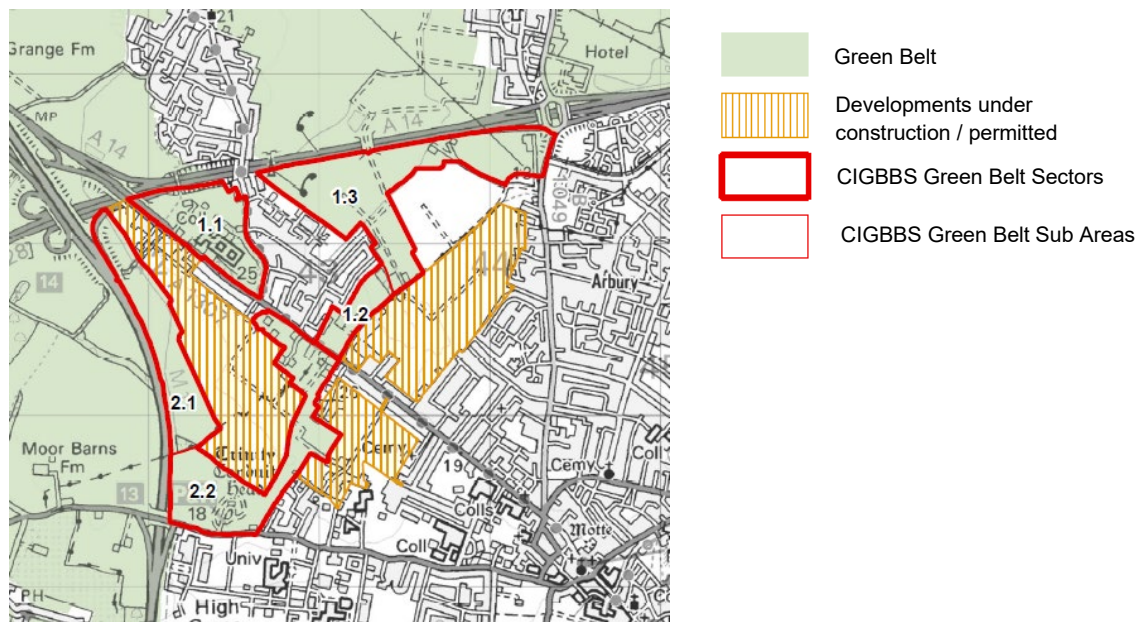


Figure 3 - Abstract of CIGBBS's Figure 2, showing Sub Area 1.2 between Girton and Darwin Green development

- 3.1.7 I consider that the rural qualities of the wider local landscape are more evident to the north of the Site (see Figure 4 and Figure 5), where medium scale, agricultural fields adjacent to the Darwin Green development preserve the undeveloped edge along the A14 corridor. Here, the fragmented field boundaries, lacking a consistent hedgerow enclosure, emphasise a sense of rural openness.
- 3.1.8 To the immediate north and south of the Site there are two fields (in the ownership of Anglia Ruskin University) which have some rural qualities, but where urban influence is evident, such as sports facilities and the visible edges of settlements. The field to the north (Figure 6) is maintained as a football ground, with some facilities and structures highlighting the recreational function. The one to the south (Figure 7) consists of grassland with some parkland trees and rugby posts. The vegetative enclosure around the fields (see Figure 4) varies in density and quality. The tree belt appears slightly fragmented along Whitehouse Lane but denser on the north-west and south-east corner.
- 3.1.9 The settlement edge of Girton defines the western boundaries of the two fields, with the Hotel Felix and associated car park extending the urban element between the fields (see the urban edge to the left in Figure 4). Map 10a in Appendix 1 of CD20 illustrates that 'The Close' has existed on the Site since at least 1889 (it was built in 1852 as a private home), suggesting that the Site has not formed part of the open countryside for many years. This and the proximity of the traffic noise on Huntingdon Road diminishes any sense of rurality.
- 3.1.10 Further urban influence on the rural character of the local landscape is provided by the existing and emerging development at Darwin Green. As illustrated in Figure 4 the extent of countryside has reduced between Girton, the A14 and Cambridge (as extended) due to developments completed and currently ongoing. To the south of the Site, the residential Eddington development has extended the townscape character towards the M11 (Figure 4), with a green corridor retained between Girton and Cambridge, as well as a rural edge along the motorway.

- 3.1.11 The local townscape is largely residential, with a distinctive fine grain in the older parts of Girton and on the urban edge of Cambridge, which contrast with some larger footprints and blocks proposed in the emerging developments (Figure 9). The Hotel Felix also differs from the small-scale residential pattern, with a larger footprint and a three-storey element.
- 3.1.12 In conclusion, the Site is located in a transitional landscape where the countryside meets the extended urban edge of Cambridge (Figure 4). While some rural qualities, such as small to medium mixed use fields with some vegetative enclosure, are still present, urban influences are increasingly prevalent. Therefore, I agree with the CIGBBS that the vegetated character of sub area 1.2 is the essential element *'contributing to the feeling of an undeveloped separation between Cambridge and Girton'* (Sector Number: 1 table, pg. 79).

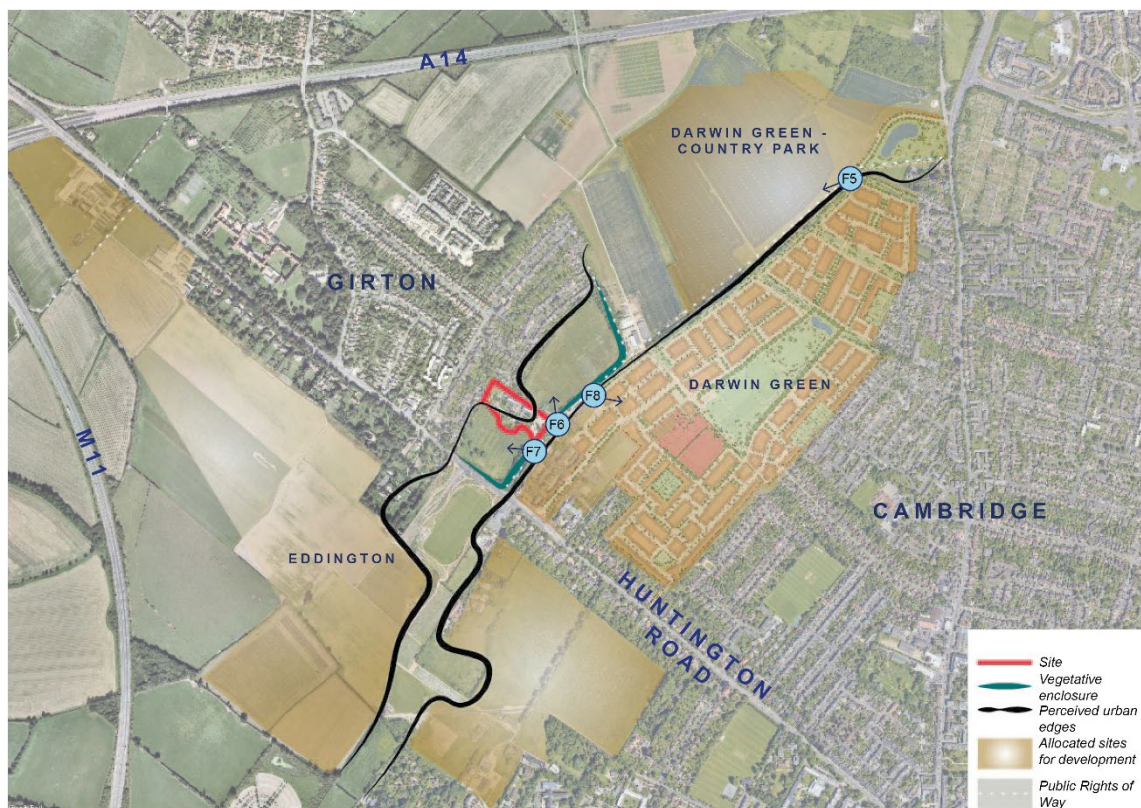


Figure 4 - Site context analysis and viewpoint location plan





*Figure 5 – (Location F5 in Figure 4) View from footpath 135/5 of the open, rural landscape between Girton and the A14*



*Figure 6 – (Location F6 in Figure 4) Sport field to the north of the Site*





*Figure 7 – (Location F7 in Figure 4) Sport field to the south of the Site*



*Figure 8 – (Location F8 in Figure 4) New Darwin Green (Local Centre phase under construction) urban edge facing the Green Belt*





Figure 9 – Local townscape fabric

## 4.0 Relevant Planning Policies

- 4.1.1 RfR1 states that the development is contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and paragraph 149 of the NPPF.

### 4.2 NPPF

- 4.2.1 Paragraph 149 lists the exceptions that apply for built development to be acceptable within the Green Belt, including:
- *‘g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
    - *not have a greater impact on the openness of the Green Belt than the existing development...’*
- 4.2.2 As the proposal would have a greater volume and footprint than the development currently on the Site (see section 4.1 below), it would be, by definition, inappropriate development according to NPPF par. 149.
- 4.2.3 However, as I have argued in the GBS (Section 9 of CD20), the proposal, because it replaces existing built form of similar scale and dimensions, will not cause a densification of the local townscape that would result in an increased sense of enclosure or the merging of Girton with the urban fringe of Cambridge.

### 4.3 South Cambridgeshire Local Plan 2018

- 4.3.1 Policy S/4 focuses on Cambridge’s Green Belt, stating that *‘New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework.’* The NPPF policies that I discuss in the previous section are therefore incorporated, by cross-reference, into the Local Plan.
- 4.3.2 However, I would also draw attention to the supporting text of Policy S/4 which, as stated above, describes the specific purposes of Cambridge’s Green Belt as being to:
- *‘Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
  - *Maintain and enhance the quality of its setting; and*
  - *Prevent communities in the environs of Cambridge from merging into one another and with the city.’*
- 4.3.3 A number of factors are said to define the *‘special character of Cambridge and its setting’* which include:
- *‘Key views of Cambridge from the surrounding countryside;*
  - *A soft green edge to the city;*
  - *A distinctive urban edge;*
  - *[...]*
  - *A landscape that retains a strong rural character.’*
- 4.3.4 The LVA and GBS demonstrate that the proposal would not result in the merging of Girton with the suburban edge of Cambridge. The closer proximity of the proposed

development to Girton (compared with the existing building) and the proposed enhancement of the landscape buffer along Whitehouse Lane (see Figure 10 and Figure 11) would improve the perceived separation between the settlements, therefore preserving the compactness of Cambridge.

- 4.3.5 The visual appraisal (Section 6 of CD20) demonstrates that key views from the countryside, agreed with the LPA, are not impacted by the proposal. The LVA and GBS also confirm that there would be no adverse effects on the local landscape and townscape receptors. Based on these findings, I believe that the ‘*soft green edge*’, ‘*distinctive urban edge*’ and rural qualities will be preserved.

## 5.0 Development Impact

### 5.1 Green Belt Openness

- 5.1.1 Even though the proposal would cause definitional harm to the Green Belt on account of its ‘inappropriateness’ in policy terms, the GBS shows that the proposal would not compromise the function of the Girton gap by altering the fabric of the landscape or townscape in such way that the adjacent settlements would merge. Nor will it adversely affect the distinctive vegetative character of the Green Belt, thereby retaining its countryside qualities.
- 5.1.2 Indeed, the improvement to the landscape of the car park area, with 1151m<sup>2</sup> of new landscape replacing the existing hard surface (see Figure 11), and the location of the proposed building closer to Girton (see Figure 10) will emphasise the separation between the two settlements and therefore preserve the individuality and integrity of Girton village. As shown in Figure 10 the new proposal (green outline) is circa 23m further away from the Site’s boundary along Whitehouse Lane than the existing building.
- 5.1.3 The assessment of the visual impact carried out in the LVA shows that the proposal would not result in a visual experience dissimilar to the existing building. If anything, the proposed development would result in a localised improvement to visual openness, thanks to a more compact building form, which reduces the visual prominence of the development on the Site (see Appendix 4 in CD20).
- 5.1.4 For these reasons, I conclude that the proposal as a whole would not reduce the perceived openness of the Green Belt (a conclusion that is very close to the Council’s position that it would have a “negligible” impact on openness).

### 5.2 Landscape and Townscape Impact

- 5.2.1 As illustrated in the LVA and GBS, the proposal will not result in adverse effects on local landscape or townscape character (Table 2, p. 22 of CD20). This is because, despite the different use and slightly increased volume, the proposed development would be similar in materiality and appearance to the existing building. Therefore, it would not alter the relevant qualities of the landscape and townscape baseline. On the contrary, it would improve the local landscape by reducing the car park surface in favour of more landscaped area.
- 5.2.2 Furthermore, as it is a replacement of the existing built form, there would not be an increase of development density (number of buildings per hectare) within the Site that would be sufficient to tilt the balance towards an urban, rather than transitional, character. Therefore, to the extent the Site has a “rural” character by virtue of its vegetative cover, this would be preserved.



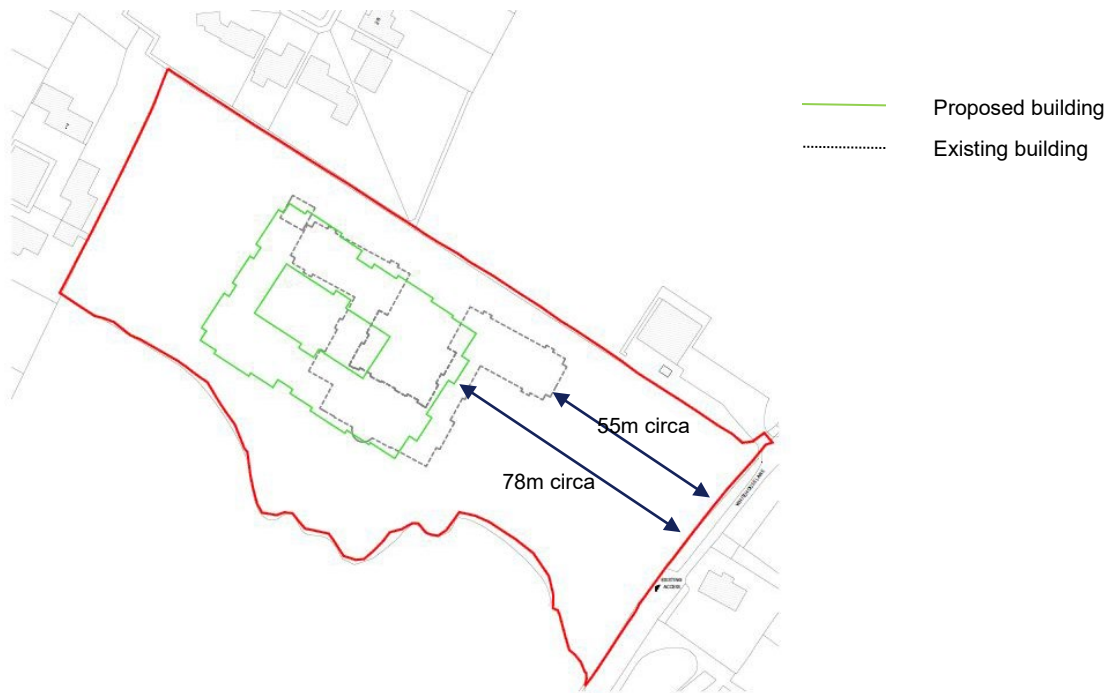


Figure 10 - Proposed site layout showing a more compact form and the built form being located closer to Girton



Figure 11 - Proposed landscape buffer to Whitehouse Lane





Figure 12 - North elevation showing the proposed more compact form compared to the existing building (in red hatch).



Figure 13 - East elevation (Whitehouse Lane) showing the proposed compact built form and similar maximum height

### 5.3 Visual Impact

- 5.3.1 As illustrated in the LVA and GBS, the proposal would not result in adverse effects on the identified visual receptors, which include road users along Huntington Road and Whitehouse Lane. The conclusion in the LVA is supported by the technical visualisations, which included viewpoints 1, 3, 4 and 5 (see Appendix 4 in CD20) from these roads. These visualizations demonstrate that the visual effect of the proposed development would be comparable to that of the existing Hotel Felix. In some instances (viewpoints 3 and 4) the proposal would actually reduce the visual impact due to its more compact form and, in places, lower height (see Figure 12 and Figure 13).
- 5.3.2 Accordingly, the visual experience along Whitehouse Lane would not only be preserved, but improved by the proposed landscape scheme on the Site and the reduced visual intrusion of the proposed built form compared to the existing Hotel Felix.

## 6.0 Committee Report

- 6.1.1 The Committee Report did not identify any concerns about the landscape, townscape or visual effects of the proposal. The Landscape Officer endorsed the findings of the LVA and GBS, concluding that the proposed development would have negligible effects on the openness of the Green Belt.
- 6.1.2 Paragraph 1.2 of the Committee Report identifies the development as inappropriate, due to the circa 33% increase in volume and circa 13% increase in built footprint. While I acknowledge the physical increase, I have demonstrated in the LVA and GBS that this does not result in a visual depreciation of openness, nor a change to the landscape and townscape character of such magnitude that the purposes of the Cambridge Green Belt would be compromised.

- 6.1.3 I note that a number of objections within the Committee Report raised concerns about the effects of the proposed development on the Girton gap:
- Girton Parish Council suggests that the *'damage to the environment, and in particular to the 'Girton Gap', which is intended as a 'green' break between Cambridge City and Girton would be considerable. Moreover, the development would not fit with the street scene of Whitehouse Lane.'*
  - The Conservation Team states the importance of preserving the Girton gap to prevent the settlements from merging.
  - A third party representation contained the observation that *'The current 'Hotel Felix' plot forms part of the important green gap between Girton and Cambridge which should be maintained.'*
- 6.1.4 It is my opinion, supported by the conclusions of the LVA and GBS, that the proposed development would not cause the settlements to merge and would therefore retain the function of the Girton gap.
- 6.1.5 The appraisal of the visual effects on Whitehouse Lane, informed by technical visualisations for Viewpoint 4, concluded that there would be no adverse effects on the receptors. In my judgment, the visual amenity of the lane would be preserved and the qualities of the street scene improved by the proposed landscape scheme.

## 7.0 Summary and Conclusion

- 7.1.1 Acknowledging that the proposal results in definitional harm according to the NPPF, my evidence has considered the appropriateness of the proposed development within the local landscape and townscape context, together with its potential visual effects. This led me to conclude that the proposal would result in no perceived harm to the openness of the Green Belt.
- 7.1.2 In forming my opinion, I have relied on the findings of the LVA and GBS produced for the original planning application for two reasons:
- 1) The scope and findings of the LVA and GBS were agreed with and endorsed by the Landscape Officer,
  - 2) The structure of the appraisal focused on the matters that would determine the level of harm (if any) to the perceived openness of the Green Belt, and more specifically the function of the Cambridge Green Belt and the Girton gap.
- 7.1.3 Since there is no definition of 'openness' in the NPPF, and that national Planning Practice Guidance (PPG) and case law<sup>6</sup> establish that openness has both spatial and visual aspects, I believe that understanding the visual perception of the proposal (an essential aspect of the LVA) is crucial when assessing the impact on the openness of the Green Belt.

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<sup>6</sup> See *Turner v Secretary of State for Communities and Local Government* (2015); and *Samuel Smith Old Brewery (Tadcaster) and others v North Yorkshire County Council* (2020).

- 7.1.4 In light of my conclusions in the LVA and GBS, I believe that the perceived openness of the Green Belt will be preserved despite the proposed increase of volume and footprint in the built form on the Site. I do not consider that the proposal would compromise the function of the Girton gap, as it would preserve the existing countryside character and the distinctive vegetative cover of the Girton gap, whilst improving the sense of separation between settlements. Furthermore, I am satisfied that the proposal would not result in adverse effects on the relevant landscape and townscape receptors, nor would it adversely effect the visual amenity of receptors on Huntingdon Road and Whitehouse Lane.
- 7.1.5 The main basis for my conclusion is the proposed compact form and location of the building closer to the residential edge of Girton. As a result of these design choices, the proposal will be visually recessive and the Girton gap will be improved by providing a wider landscape area along Whitehouse Lane.
- 7.1.6 For these reasons, in my professional judgment, considerations relating to the openness of the Green Belt, or to landscape and visual matters, do not provide a basis for refusing planning permission in this case.

