

Item 6, Christ's College Library, Wednesday 7 October 2026: we ask for the item to be deferred until members have a corrected report and an accurate record before them.

To: Councillor Katie Porrer, Chair of the Planning Committee, Cambridge City Council; Stephen Kelly, Joint Director of Planning and Economic Development, Greater Cambridge Shared Planning. Copy: Democratic Services; the case officer; the Senior Planning Lawyer; the Monitoring Officer; the fourteen members of the Planning Committee; planning@greatercambridgeplanning.org and PlanningComments@greatercambridgeplanning.org for the register. From: Prof. Suchitra Sebastian and Dr. Anna M. Dempster, for Christ's Lane Action Group, from our own addresses; please reply to those addresses, not from the mailbox. Filed Monday 5 October 2026, by email, for the public register of application 26/02109/FUL. Our letter to the members of the Planning Committee of 30 September 2026 stands.

Dear Councillor Porrer, Dear Joint Director of Planning,

We write to you as individuals, on behalf of Christ's Lane Action Group, because the group's own emails do not reach the people they are sent to. We ask you to defer item 6 from Wednesday's agenda, and to tell us in writing by 12 noon on Monday 5 October that it is deferred. The report before members is wrong about what the Court has done, says nothing about the seventeen documents we sent on 25 September, before it was written and five days before it was published, and tells members the register's dates are right when the Council's own files show they are not. Our letter to the members was blocked for two working days by the officers whose report it criticises. The item should come back when a report that puts those things right, and corrects the errors in the 2025 decision that the Court's judgment identifies, has been open to the public for five clear working days. If the item stays on the agenda, we ask the Joint Director, by the same time, to correct the report and the register and to put the documents named below in front of every member in full. The questions at the end of this letter need answers by the same time.

This is what has been kept from members.

1. **Our seventeen documents are not in the members' papers.** We sent them on Friday 25 September 2026, between 3.13 pm and 4.28 pm, setting out the Council's policy violations point by point. The report file was created on Monday 28 September at 10.10 am, the next working day, and its 115 pages refer to no document of 25 September. The report lists no background papers at all, which section 100D(1)(a) of the Local Government Act 1972 requires of every copy open to the public. The Council's answer, through its mailbox, is that our documents "will however be uploaded to the portal and referenced within the amendment/ update sheet circulated prior to the meeting". A reference in a sheet handed out the day before the vote is not consideration of our case under section 70(2) of the Town and Country Planning Act 1990. The Statement of Community Involvement promises reports "at least five working days before the meeting" (paragraph 4.29). The documents have not been provided to members.

Evidence: the file's own properties (Annex 5c); the Council's weekly response of 29 September (Annex 7); the report.

2. **The Council has admitted to the High Court that the Committee was misled last year, and members have not been told.** On 28 April 2026 the Council and the College signed a draft consent order and statement of matters in which the Council "accepts that the Decision Notice should be quashed" on all four grounds of our claim. That is the Council's own written admission that the Committee "was materially misled" when it approved this identical scheme in 2025. On Tuesday 29 September at 11.27 am the Council's lawyer told the judge that a consent order "signed by a Judge and sealed by the Court" had the effect of "thereby quashing the decision under challenge on 25 August 2026". That afternoon the judge ordered that our hearing of 20 October "shall remain listed". The report, whose file the Council made on Monday 28 September, tells members: "The planning permission still stands until such time as the Court determines otherwise." It has not been corrected. It says the hearing is "currently scheduled for mid-October 2026". It says at paragraph 1.5 that the judge's order granting us permission is at Appendix 1. It is not; Appendix 1 is our statement of case alone. None of these Court documents is in the members' papers. Evidence: Annex C to our letter of 30 September; Annexes 1 and 2; the report, paragraphs 1.2 and 1.5; document s73711.
3. **We have been blocked from reaching members and the Council's own officers.** Every email we have sent the Council since 20 August, whoever it was addressed to, is logged by the Council with "Recipient: Single Point of Contact (SPOC)". Our letter to all fourteen members of the Committee, sent on Wednesday 30 September at 9.27 am to their council addresses, was not received by members. What reached them was the mailbox's forward at 4.44 pm on Friday 2 October, sixteen minutes before the weekend, with an officer's note that emails from the group "are automatically diverted to the Single Point of Contact (SPOC)". The public's deadline for written statements is noon on Monday. Our letters of 25 September to the conservation officer, the environmental health officer and the sustainability officer, asking each to look again at advice the file now contradicts, went into the same mailbox; none of the three has replied. On 30 September we wrote to Democratic Services objecting that the agenda's link to the report was a blank file in the five clear days before the meeting, and asking for the item to be withdrawn. No reply has come. Evidence: the weekly responses of 1, 22 and 29 September (Annex 7); Annex 6; Annex 4; our letter to Democratic Services of 30 September (Annex F to our letter of 30 September).
4. **Our Court papers were diverted too, and the Council wrote to the judge without copying us.** Our hearing bundles and skeleton argument, served on the Council's lawyers, were logged by the same mailbox and "forwarded to the relevant teams for consideration"; no lawyer acknowledged them. We conduct the claim ourselves, as litigants in person, and had told the Council's lawyer so in writing on 23 September and again at 10.12 am on 29 September. At 11.27 am on 29 September the Council's lawyer wrote to the judge backing the College's attempt to have our hearing taken out of the list, and did not copy us. The mailbox sent us that email at 4.48 pm, fifty minutes after the judge's order. Evidence: Annex 7; Annex 1; our emails to the Court of 23 September at 2.05 pm and 29 September at 10.12 am, copied to the Senior Planning Lawyer.

5. **This is the opposite of what the Council told us in writing.** On 26 August the Council wrote to us: “CLAG retains the right to communicate as it wishes with elected members.” It wrote that it “has not designated CLAG or any of its members unreasonably persistent or vexatious, nor has it made any finding of unreasonable behaviour”. It wrote: “The imposition of the SPOC does not affect the service and timescales of correspondence in AC-2025-LON-004656.” The protocol the Joint Director relied on gives members “the option to forward” our mail to the mailbox, “although this will be their choice”; an automatic diversion takes that choice away from members. None of those sentences was sent to members with the officer’s note of 2 October. We were assured we could write to councillors like any other objector. Yet here we are. The Statement of Community Involvement promises “consultation methods that are consistent to all” (paragraph 1.3). Evidence: Annex 8; the South Cambridgeshire District Council SPOC Protocol; Annex 6.

6. **Our papers have been backdated on the register.** The Council’s document numbers go up in the order documents are created; the twenty six creation stamps at Annex 5 go up with them without exception. Sorted by number, 113 of our 152 documents on the register are shown under a date earlier than the date shown against a document with a lower number. Each of the 113 went up after the date it is shown under: on average at least 4.7 days after, and in one case at least 30 days. Of the College’s 108 documents, two. Our seventeen documents are the latest instance. None was on the register in any of our fourteen timed prints up to 2.11 pm on Wednesday 30 September; they appeared between 4.25 pm that day and 10.50 am on Friday 2 October, shown under 25, 28 and 29 September. The Council’s own file of our letter to the conservation officer (document 9542391, shown under 25 Sep 2026) was created on 1 October at 5.27 pm. The report tells members at page 88: “Officers are of the view that all representations are uploaded against dates that reflect when they were uploaded.” That is not accurate, and demonstrably so: the register’s own numbering and the Council’s own files prove the opposite for 113 of our documents. Why it matters: the register is the public record of when a document became available. Dating ours to the day we sent them hides that they appeared days later, after the report, too late to be read before the deadline. A High Court judge said of a council that dated a report on its website to a day before it went up: “As I made clear at the hearing I take a dim view of any public authority backdating a document in a manner which could give a false impression to the public.” (R (Joicey) v Northumberland CC [2014] EWHC 3657 (Admin) at [45]). Evidence: Annexes 3, 5 and 9; the report, Table 3, page 88.

7. **None of our planning objections has been answered, and the report claims to have avoided errors the Court has not yet defined.** Since June the group has put to the Council in writing the planning rules this scheme breaks: the harm to the Grade I listed buildings, the tall buildings policy, the lower alternatives the College has never examined. None has been answered on its substance. Paragraph 1.15 of the report says the Council has “conceded in writing to all four grounds of challenge”. Paragraph 10.14 says: “This officer report addresses the grounds of challenge, to avoid any error of law and minimise the risk of further challenge.” The Court that will say what those errors were sits on Tuesday 20 October, thirteen days after the meeting. The report’s only answer to the requests for deferral is that “There is nothing to prevent the applicant

from submitting a new (and identical) application in the interim as has been done, and for that to be considered by the Council against that backdrop.” That is a statement of what the Council may do, not a planning reason for deciding the identical application before the Court’s judgment. On 29 September we served a formal notice of intended proceedings, the first step of a judicial review. It asked the Council to confirm by 5 pm on 30 September that it would defer the decision so that those errors could be corrected, and to reply in full by 5 pm on 2 October. The mailbox logged it. Nothing has come back. A second notice is served today. Evidence: the report, paragraphs 1.15 and 10.14; our notice of 29 September, on the register under 01 Oct 2026; Annex 7.

8. **The Council has not said that no decision notice will issue before the judgment.** Last time, the Committee resolved on Wednesday 29 October 2025 and the notice issued on Friday 7 November. The same nine days from 7 October end on Friday 16 October, four days before our hearing. The Court of Appeal has said that an officer who learns of a new material consideration before issuing a notice must “refer the matter back to committee for reconsideration in the light of the new consideration. If he fails to do so, the authority will be in breach of its statutory duty.” (R (Kides) v South Cambridgeshire DC [2002] EWCA Civ 1370 at [125]). Evidence: the report, paragraph 1.1; Kides at [125].

What we ask for, in writing, by 12 noon on Monday 5 October 2026:

1. From Councillor Porrer, as Chair: that item 6 is deferred, to return when a report that puts right the matters above, and corrects the errors the Court’s judgment identifies, has been open to the public for five clear working days.
2. From the Joint Director, if the item stays: the Council’s signed admission of 28 April, its email to the judge and the judge’s order of 29 September put in front of every member in full. Paragraphs 1.2, 1.5 and 10.14 corrected, or a statement that they stand as written. The list of background papers.
3. Our seventeen documents put in front of members in full. Whether each of the three officers we wrote to will answer in writing before the meeting. Whether the amendment sheet will assess each document or merely refer to it.
4. The register’s dates for the 113 documents corrected to the days each went up. The sentence at page 88 withdrawn to members in writing. For each of our 152 documents: when it was received, when it was created in the Council’s system and with what number, when it was published, what date was entered, and on whose instruction. Our letter to the Committee of 30 September displayed on the register.
5. The delivery record for our email of 30 September at 9.27 am to each of the fourteen members. The Council’s three statements of 26 August sent to them, with a correction of the officer’s note of 2 October. The block lifted from members’ addresses and from Court correspondence. The records of the block itself are asked for in our letter of today to the Chief Executive and the Monitoring Officer.
6. The planning reasons for deciding on 7 October rather than on a report that corrects the errors the judgment identifies. Whether the College has asked for a decision before the hearing, and in what terms.

7. By 5 pm on Tuesday 6 October: that no decision notice will issue before the judgment, and that any resolution will go back to the Committee in the light of it.

If the matter remains on the agenda for 7 October, this letter and your answers, or your silence, go to the Court on Tuesday 20 October and into any claim against Wednesday's decision. We do not oppose a new library. We ask for a fair and equitable planning process: a corrected report and an accurate record that do not mislead members.

Yours faithfully,

Prof. Suchitra Sebastian Professor of Physics, Cavendish Laboratory, Cambridge Resident,
Christ's Lane C.L.A.G Member

Dr. Anna M. Dempster Chair of Arts & Fellow Wolfson College Cambridge Resident, Brunswick
Area C.L.A.G Member

for Christ's Lane Action Group

Annexes: 1, the Council's email to the Court of 29 September 2026 at 11.27 am, as forwarded from the mailbox at 4.48 pm; 2, the order of Sir Peter Lane of 29 September 2026 (register document 9541595); 3, our print of the register of Sunday 4 October 2026 at 5.51 am; 4, the agenda page captured at 11.56 am on 30 September 2026 and the capture log of document s73709; 5, the creation stamps of forty four register files read on 4 October 2026, with the capture note (5a), the stamps table (5b) and the reports pack note (5c); 6, the mailbox's email to the fourteen members of 2 October 2026 at 4.44 pm; 7, the Council's weekly responses of 29 September (7a), 22 September (7b) and 1 September 2026 (7c); 8, the Council's response to us of 26 August 2026; 9, our count of the register's entries by document number, 4 October 2026, with the method and all 349 entries.