

Exhibit R1 to CLAG's register integrity letter (24 September 2026): CLAG's copies of the Council's correspondence to it

Filed with CLAG's register integrity letter (24 September 2026), for the public register of application 26/02109/FUL.

CLAG has masked in black a CLAG member's name and personal email address in the forwarding headers within CLAG (pages 8, 10, 27 and 31), the name and email address of an individual at the applicant's solicitors (pages 10, 11, 13 and 14) and three telephone numbers in signature blocks (pages 8, 10, 13, 14 and 27)

Each item is CLAG's copy of correspondence the Council sent to it. Every page carries its item number, its page within the item and its page in this exhibit; the document itself is reproduced below the stamp at a slightly reduced size and is otherwise unchanged. None of the items is on the register in its own right except as stated.

1. Item R1.1: CLAG's letter of 7 July 2026 to the Senior Planning Lawyer with the Council's response of 21 July 2026 interleaved, in the Council's own document, as sent to CLAG on 22 July 2026 (6 pages). The letter quotes from its page 3: "CLAG as an objector will be treated exactly the same as any other objector on any planning application." and "All relevant material in respect of the planning application will be placed on the planning portal."
2. Item R1.2: the Senior Planning Lawyer's email to CLAG of 13 August 2026, answering CLAG's letter of 7 August 2026 (register document 9490029) on the publication of the Victorian Society exchange (2 pages). The letter quotes its items (b) and (c).
3. Item R1.3: the Senior Planning Lawyer's email to CLAG of 16 July 2026 at 16:59, copied to the applicant's solicitors, refusing to upload CLAG's record of the applicant's public meeting of 6 July 2026, with the chain below it: CLAG's reply of 14:51, the Senior Planning Lawyer's email of 13:58 and the applicant's solicitors' email of 09:11 (6 pages). The times printed on CLAG's copy are the receiving client's, in a zone five and a half hours ahead of Greenwich Mean Time: "Thu, 16 Jul 2026 at 21:29" is 16:59 British Summer Time and "18:28:10 GMT+5:30" is 13:58. The chain below the refusal is also on the register as document 9476426; the refusal is not.
4. Item R1.4: CLAG's letter of 14 July 2026 to the Senior Planning Lawyer with the Council's response of 21 July 2026 interleaved, in the Council's own document (11 pages), and the Senior Planning Lawyer's covering email of 22 July 2026 sending the responses to the letters of 7 and 14 July (2 pages). The letter quotes from its page 5: "The letter of the 10 July has been uploaded."
5. Item R1.5: the Director of Planning's notice to CLAG of 20 August 2026 introducing a single point of contact arrangement (2 pages), and the Director of Planning's email of 21 August 2026 correcting the start day to Friday 21 August 2026 (3 pages).
6. Item R1.6: the Council's response of 28 August 2026 to CLAG's letter of 21 August 2026 to the Director of Planning, setting CLAG's requests (a) to (j) beside the Council's answers (3 pages).
7. Item R1.7: the South Cambridgeshire District Council "SPOC Protocol", as published on that council's website and cited in the notice of 20 August 2026, downloaded by CLAG on 20 August 2026 (4 pages).

CHRIST'S LANE ACTION GROUP

residents@christs-lane.com · www.christslaneactiongroup.org

7 July 2026 — by email

Vanessa Blane, Senior Planning Lawyer

3C Shared Services — Legal Practice, for Cambridge City Council

Your ref: 2555204

Copy: Dominic Bush, Greater Cambridge Shared Planning

For the public planning file, application 26/02109/FUL

Dear Ms Blane,

Application 26/02109/FUL, Christ's Lane: the Council's comments of 2 July 2026, the consultation deadline, and the determination timetable

We acknowledge safe receipt of your email of 2 July 2026 (16:58) and the attached document setting out the Council's responses to CLAG's letters of 23 and 24 June. We reply below on the matters left outstanding, and on the timetable to determination: a timetable the Council's own published dates now control. This letter seeks written confirmation, by 12 noon on Friday 10 July 2026, of seven matters: the consultation deadline; the publication of statutory and amenity-society advice; the committee timetable and the mode of determination; the daylight and sunlight evidence; the construction and highways material; the treatment in the officer's report of the four grounds the Council has conceded; and the Bursar's email of 11 June 2026.

1. The closing date: the Council's response contradicts its own notification letters

The comments of 2 July state, repeatedly, that consultation runs to 9 July 2026, and the portal displays the same date. Yet the Council's own re-notification letters, issued after CLAG identified the omission of 19, 20 and 21 Christ's Lane, and now on the portal, state 22 July 2026. The amendment letter of 24 June gave 3 July. Three published deadlines therefore sit on a single file at once.

The law resolves the contradiction. Article 15 of the 2015 Order requires not less than 21 days for representations, running from notification; and notification was completed only when the final three residential addresses on the lane, 19, 20 and 21 Christ's Lane, were notified. The operative date is therefore 22 July 2026, and neither the 9 July asserted in correspondence nor the 3 July of the amendment letter can stand against the Council's own later letters.

We ask the Council to confirm 22 July 2026 formally, in a published notice to all previously notified persons; to correct the portal accordingly; and to state, as twice requested and twice unanswered, the date on which notification was in fact issued to 19, 20 and 21 Christ's Lane. The public is entitled to a single, authoritative deadline. Asserting 9 July in correspondence while the Council's own letters state 22 July is the opposite of that..

The Council confirms that all notified residents, including the occupants of 19,20 & 21 Christ Lane were notified on the 14 July that the consultation periods closes on the 22 July and this date is displayed on the planning portal.

2. The statutory advice must reach the public within the period

Historic England's consultation period expires on 9 July 2026. Under Articles 18 and 22 of the 2015 Order the application cannot in any event be determined before that period has expired and the response has been considered; and where a statutory consultee's advice arrives late or is supplemented, the duty to consider it does not lapse; it displaces any earlier attempt to determine. We therefore ask the Council to confirm that Historic England's response will be published on the portal on receipt, so that the public can address the statutory advice on the College's new "*minor beneficial impact*" heritage case before the comment period closes, and that any further applicant material will attract a corresponding extension of that period.

Historic England's response was published on the planning portal on the 8 July

On the Victorian Society, the position is not that its advice is awaited: the Society has already responded. Its letter of 6 July 2026 addresses, and rejects, the Covering Statement's assertion that sections 66 and 72 "*operate positively*" in the applicant's favour, the very proposition on which the renewed heritage case depends. We ask the Council to confirm that this letter is logged against application 26/02109/FUL and published on the portal now. –

The Victorian Society's letter of 6 July is displayed on the planning portal.

3. The determination timetable

The Committee's published schedule shows its next sitting on 29 July 2026. Reporting this application to that sitting would require the officer's report to be finalised within about two days of the consultation closing on 22 July, before objections could be scrutinised, before the outstanding statutory consultees' and national amenity societies' advice could be weighed, and before the Development Control Forum could be held, CLAG's petition for which Democratic Services confirmed receipt of on 3 July.

The Council's statement that the report will be published "in the normal way, which will be 5 days before the Planning Committee" describes the statutory minimum for access to committee papers under section 100B of the Local Government Act 1972. That is a floor, not a measure of fairness; least of all on an application whose predecessor the Council has already agreed should be quashed on all four grounds, in part because the committee was not given an accurate picture.

The point is not abstract. On the predecessor application, this same compression: consultation closing days before committee, with no time to check or correct, is precisely how the conceded errors reached members uncorrected. The last judicial review turned on exactly that: a report that could not be tested in the window allowed, in which the Council conceded members were misled. To run the identical timetable again, on a materially identical scheme, while the substantive hearing listed for 20 October 2026 is still pending, would reproduce the very circumstances that produced the concession.

We therefore ask the Council to confirm:

- that the officer's report will be published at least 14 days before any committee at which the application is considered, so that consultees and the public can verify, before members meet, whether each of the four conceded grounds has in fact been corrected;

The report will be published in line with statutory requirements and the Council's procedure which is five days prior to the Planning Committee.

that no committee will take place before the Development Control Forum has been held;

The Development Control Forum is scheduled to take place on the 29 July, the Planning Application is due before the Planning Committee on the 2 September.

- that the application will be determined by the Planning Committee and not under delegated powers, given the volume and substance of objections, the statutory consultee positions, the DCF petition, and the live High Court proceedings;

The application will be determined by Planning Committee.

- the target committee date; and

Planning Committee is scheduled to take place on the 2 September.

- CLAG's registration as an interested party, with direct notification of all material updates and of any proposed committee date, as requested on 24 June and not yet answered.

CLAG as an objector will be treated exactly the same as any other objector on any planning application. The Council is not required to register CLAG as interested party. All relevant material in respect of the planning application will be placed on the planning portal.

4. Daylight, sunlight and overshadowing

The Council's answer of 2 July addresses validation; the question was, and remains, the adequacy of the evidence. Validation confirms only that a document exists, it says nothing about whether that document can support a lawful decision. The distinction matters here because the study uploaded on 24 June repeats the very methodology already shown to be deficient: a snapshot approach built on selected dates and times from a single favourable angle, with no transient overshadowing plotted across the day or the year.

That deficiency is not merely CLAG's assertion. An independent RICS consultant, Jonathan Lonergan MRICS of eb7, assessed this submission against BRE Report 209 and found non-compliance in his report of 16 October 2025. The point is compounded by the applicant's own conduct: at the 25/02161/FUL Development Control Forum the officer asked the College to provide shadow plots for all times of day and all times of year, and the College undertook to check whether it could do so. It has not provided them. Instead, the same selectively presented shadow plots, the single-angle snapshots at chosen dates and times that prompted the officer's request in the first place, have reappeared unchanged in the 24 June submission. The evidential gap is therefore known to the Council, identified by a qualified specialist, and left unfilled despite an express undertaking to consider filling it. eb7's review will be submitted as a formal representation on this application within the consultation period.

We repeat the request for a BRE 209 (2022) compliant assessment, carried out by a qualified specialist and published with a fair period for comment. If the Council intends to determine the application without one, the officer's report must say so in terms and explain why, so that members decide in the knowledge that the daylight and sunlight evidence before them falls short of the recognised standard, rather than being left to assume it does not.

The Officer Report will, on the information it considers relevant, assess the impact of Daylight, sunlight and overshadowing

5. Construction and highways: the quashed permission cannot be incorporated by reference

We draw your attention to the Local Highway Authority's response on this application, which specifically asks for the condition and details approved under 25/02161/FUL to be included in this submission. That request confirms the very point CLAG raised on 24 June, but it is squarely at odds with the Council's comment of 2 July that "*a demolition and construction environmental plan was submitted with the application.*" Both cannot be true. If such a plan was submitted with 26/02109/FUL, the Highway Authority would have no need to reach back to the earlier condition; kindly identify that document now, by title and upload date.

The position in law is straightforward. The approval under Condition 3 attaches to a permission the Council has agreed should be quashed on all four grounds. It cannot be carried into this application, nor treated as satisfying any requirement of it. If the applicant intends to rely on that material, whether the approved Construction Management Plan or any highway detail, it must be submitted afresh as application documents under 26/02109/FUL, published on the portal, and consulted upon, with the consultation period running accordingly. Nor would a freshly imposed condition in equivalent terms cure the present defect: residents, retailers and consultees are being asked to comment now, while the construction impacts on a narrow historic lane remain unassessable because the material on which they depend sits on a permission that is to be quashed.

The same applies to the eight condition-discharge approvals as a class. Privilege attaches to the Council's legal advice; it does not attach to the Council's position, and third parties are entitled to know whether those approvals are treated as effective on this application. If the Council declines to state its position, CLAG will invite the committee to proceed on the basis that the approvals do not survive quashing, and will rely on that refusal in any subsequent proceedings.

A demolition and construction environmental plan was submitted with the application (26/02109/FUL) on the 5 June. The Highways authority have requested a traffic management plan condition and has stated "that it requests the applicant submits the construction traffic management plan approved under planning permission ref 25/02161/FUL".

A relevant planning condition will be attached to a new planning permission issued.

6. The officer's report and the conceded grounds

The Council's statement that it is "not obliged to respond" to the request that the report address each conceded ground individually is noted and placed on record. The obligation in play is not owed to CLAG. It is owed to the committee, and ultimately to the court. An officer's report which significantly misleads members on a material matter renders the resulting decision unlawful (*Mansell v Tonbridge and Malling BC* EWCA Civ 1314); and where a decision has been quashed, the concession is itself a material consideration the report must identify, addressing specifically and ground by ground how each conceded error is corrected (*Kides v South Cambridgeshire DC* EWCA Civ 1370).

That correction cannot be assumed from the fact that the design is unchanged, because the errors are not errors of design. They are errors of reasoning, and the reasoning has returned:

- **Ground 1 (Historic England):** members were told Historic England did not object when it had found harm from excessive bulk. The report must convey that advice accurately and in substance, and must not present it as consistent with a no-harm or beneficial conclusion, least of all while Historic England's response on the second application has not yet arrived.

- **Ground 2 (the heritage balance):** the first report failed to weigh the harm lawfully. The renewed case does not merely repeat that error but goes further, asserting at paragraphs 3.13–3.16 of the Covering Statement that because the scheme is "beneficial" the sections 66 and 72 balance "does not apply." That inverts a protective duty. The report must carry out the balance and give any harm the considerable importance and weight the law requires.
- **Ground 3 (optimum viable use):** an irrelevant heritage concept, applied to a working college in continuous use for five centuries. It has reappeared unchanged in the College's new submission; the same OVU reasoning conceded to be unlawful, carried over word for word at Planning Statement paragraphs 6.27 and 8.15–8.16. The report must confirm those paragraphs will not be adopted as optimum-viable-use, or equivalent heritage, benefits.
- **Ground 4 (less harmful alternatives):** never considered once harm was identified, though the College's own 2016 basemented scheme drew no bulk or massing harm assessment. The report must engage the credible lower-impact comparators, not leave them unaddressed again.

If the report does not do these things, the conceded defects will not merely recur; they will recur with knowledge, on a scheme whose predecessor the Council has already agreed should be quashed on every one of these grounds. This correspondence will be relied on. –

The officer report will address the four grounds on which the Council has indicated it would concede the Judicial Review.

7. The Bursar's email of 11 June 2026

"Usual procedures" does not answer the question. The question is not how correspondence is generally handled, but whether this contact has been handled correctly: whether the email is on the public planning file where representations belong, and whether members have been advised on the proper handling of private applicant contact concerning a live application. We therefore ask the Council to confirm, specifically, that the email in question is on the public planning file for 26/02109/FUL, and that committee members have been advised on the handling of direct applicant contact made outside the public consultation process while the application is live and while proceedings are pending. Absent that confirmation, CLAG will be left with no option but to place this correspondence before members directly.

The email has been placed on the planning portal. Legal advice given to members of the planning committee is privileged.

Requests

Please confirm in writing, by 12 noon on Friday 10 July 2026:

i. **The closing date.** Formal, published confirmation that the consultation closes on 22 July 2026 for all parties; that the portal has been corrected accordingly; that all previously notified persons have been informed; and the date on which notification was in fact issued to 19, 20 and 21 Christ's Lane.

ii. **Statutory and amenity-society advice.** That Historic England's responses will be published on the portal on receipt; that the Victorian Society's letter of 6 July 2026 is logged against 26/02109/FUL and published now; and that any further applicant material will attract a corresponding extension of the consultation period.

iii. **Mode and timing of determination.** That the application will be determined by the Planning Committee and not under delegated powers; that the officer's report will be published at least 14 days before any committee at which it is considered; and that no committee will precede the Development Control Forum.

iv. **Committee date and standing.** The target committee date; and CLAG's registration as an interested party, with direct notification of all material updates and of any proposed committee date.

v. **Daylight and sunlight.** The Council's position on whether a BRE 209 (2022) compliant assessment by a qualified specialist will be required, and if not, that the officer's report will say so in terms and explain why.

vi. **Construction and highways.** Confirmation that the details approved under Condition 3 of 25/02161/FUL will not be carried over into, or treated as satisfying any requirement of, this application; that any construction or highway material relied on will be submitted afresh under 26/02109/FUL, published and consulted upon, with the period adjusted accordingly; the identity, title and upload date of the "demolition and construction environmental plan" referred to on 2 July; and the Council's position on whether the eight condition-discharge approvals are treated as effective on this application.

vii. **The Bursar's email.** Confirmation that the email is on the public planning file for 26/02109/FUL, and that committee members have been advised on the handling of private applicant contact made outside the public consultation process while the application is live and while proceedings are pending.

This letter is placed on the public planning file for 26/02109/FUL and on CLAG's public record; CLAG accepts no duty of confidentiality in respect of it. All rights are reserved, including in respect of the hearing listed for 20 October 2026, any challenge to a determination of this application, and costs.

Yours sincerely,

Christ's Lane Action Group

residents@christs-lane.com · www.christslaneactiongroup.org

20/08/2026

Subject: Fwd: 26/02109/FUL: publication of the Victorian Society exchange
From: "Christ's Lane Residents" <residents@christs-lane.com>
Sent: 13/08/2026, 13:30:56
To: [REDACTED]
Attachments: Victorian society initial comments.pdf; Victorian society additional response 9th July (uploaded 23rd July).pdf

Sent from my iPhone

Begin forwarded message:

From: Vanessa Blane <Vanessa.Blane@3csharedservices.org>
Date: 13 August 2026 at 15:59:23 GMT+5:30
To: Christ's Lane Action Group <residents@christs-lane.com>
Subject: FW: 26/02109/FUL: publication of the Victorian Society exchange

Dear Chris Lane Action Group

Further to your letter of 7 August.

Please find below the Council's response to the contents of paragraph 5 of your letter.

- a. The Officer's report will address the exchange including the response of the Victorian Society.
- b. The display date of this representation has been changed to the 16th July to reflect the date it was uploaded.
- c. The Council does not consider that it is necessary to "reopen" the consultation period to allow the public to respond to the exchange. The Council considers that there has been sufficient time to comment given that the latest document was uploaded to the public portal on the 23rd July. It is not in line with the Council's normal procedures to provide for re-consultation following consultee comments being received. Any comments which are received will be for the case officer to review, assess and where required refer to in their report. The Council does not consider that any new information has been provided by the Victorian Society that requires re-consultation. Both responses are attached for ease.

Kind regards

Vanessa

Vanessa Blane
Senior Planning Lawyer
3C Shared Services – Legal Practice
(Corporate Group)

3C Shared Services – Legal Practice



Telephone: [REDACTED]
Email: vanessa.blane@3csharedservices.org

Main Office Address: South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

20/08/2026

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20/08/2026

Subject: Fwd: Fwd: Christ College Library - St Andrews Street, Cambridge 2555204
From: "Christ's Lane Action Group" <residents@christs-lane.com>
Sent: 17/07/2026, 02:14:18
To: [REDACTED] [REDACTED]

----- Forwarded message -----

From: **Vanessa Blane** <Vanessa.Blane@3csharedservices.org>
Date: Thu, 16 Jul 2026 at 21:29
Subject: RE: Fwd: Christ College Library - St Andrews Street, Cambridge 2555204
To: Christ's Lane Action Group <residents@christs-lane.com>
Cc: [REDACTED] [REDACTED]

Dear Christ Lane Action Group,

Further to you email below.

Your comments are noted. However, the Council is not prepared to upload onto the planning portal, the unauthorised copy of the transcript which the Council has been advised, has not been agreed, verified, or approved by the participants of the meeting.

Kind regards

Vanessa Blane

Vanessa Blane

Senior Planning Lawyer

3C Shared Services – Legal Practice

(Corporate Group)

3C Shared Services – Legal Practice



Telephone: [REDACTED]

Email: vanessa.blane@3csharedservices.org

Main Office Address: South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

The address above is the only address for service of correspondence unless expressly otherwise

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stated.

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**3C Shared Services is a strategic partnership between Cambridge City Council,
Huntingdonshire District Council and South Cambridgeshire District Council**

From: Christ's Lane Action Group <residents@christs-lane.com>
Sent: 16 July 2026 14:51
To: Vanessa Blane <Vanessa.Blane@3csharedservices.org>
Cc: Planning <planning@greatercambridgeplanning.org>; PlanningComments <PlanningComments@greatercambridgeplanning.org>; Dominic Bush <Dominic.Bush@greatercambridgeplanning.org>
Subject: Re: Fwd: Christ College Library - St Andrews Street, Cambridge 2555204

Dear Vanessa Blane,

Thank you for confirming that the requested documents are now being uploaded to the planning portal. We would be grateful for confirmation, once the process is complete, of each item published, so that we can verify the register against our missing documents letter.

We write to address the single exception, the record of the College's public consultation meeting of 6 July 2026, and the objection of [REDACTED] of Ashtons Legal set out in the email of 16 July.

1. The meeting was an open public meeting, on the College's own characterisation. The Bursar's letter of 11 June 2026, signed by Michael Parsons and posted directly to local residents, invited them to "the open meeting that the College will be holding for local residents on Monday 6 July, starting at 6.00 pm in Seminar Room 2/3, Yusuf Hamied Court, Christ's College". A redacted copy is attached. The same invitation was emailed on 11 June 2026 to all Cambridge City councillors, copied to the case officer, noting that any members of the Planning Committee attending would do so as observers. No expectation of privacy or confidentiality can attach to statements made by the applicant's representatives, in their official capacities, at a public consultation event held to promote a live planning application, to which local residents and every city councillor were invited. There is no legal prohibition on an attendee recording an open public meeting, and no requirement that a private attendee announce that they are doing so.

2. The College itself relies on the 6 July meeting as part of the public consultation record on this application. In his email of 8 July 2026 declining to participate in a Development Control Forum, also attached in redacted form, the Bursar listed the consultation events the College has supported, ending "And most recently an Open Meeting (6 July 2026)", and expressed the hope, in relation to the previous forum, that the Council "could make available minutes of that meeting for anyone not present". The College cannot rely on the open meeting as consultation while objecting to publication of a record of what was said at it. The principle the Bursar himself stated, that minutes of consultation meetings should be available to those not present, is precisely what the record achieves.

3. The document is not a "purported transcript". It states on its face that it has been prepared from the complete audio, that it "is not a verbatim transcript, but a faithful minute of the exchanges, retaining direct quotation where the precise wording is material", and that private attendees are identified by role or capacity only, with individuals named only where they spoke in an official or applicant team capacity. It was prepared, and redacted, precisely so that it could properly be placed on the public register.

4. The record is a representation on a live application, which the Council must take into account under article 18(7) of the DMPO 2015 and section 70(2) of the Town and Country Planning Act 1990. Paragraph 4.19 of the Council's adopted Statement of Community Involvement is unqualified: "Representations will be added to the application file and made publicly available online alongside the planning application documents." That commitment gives rise to a legitimate expectation enforceable on judicial review (*R (Majed) v Camden LBC* [2019] EWHC 1029). Nothing gives an applicant a veto over the public register; the concern that the record "may be afforded evidential weight in the determination of the application" is an argument about weight, which is a matter for the case officer and

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for members.

5. In any event the record is environmental information held by the Council, disclosable to any person on request under regulation 5(1) of the Environmental Information Regulations 2004. The only relevant exception, regulation 12(5)(f), protects the supplier of the information, and we, as supplier, request publication. Withholding the record from the register would simply oblige the Council to disclose the same document to each resident who asks.

6. The College has not identified a single inaccuracy in the record. If it considers any passage inaccurate, we invite it to identify the passage: the complete audio recording exists, the record can be verified against it, and we will correct any demonstrated error. The College is equally free to place its own account of the meeting on the register alongside ours. What would be procedurally unfair is the opposite arrangement: the applicant's own characterisation of its consultation before the Council, and the residents' record of the same meeting excluded at the applicant's request.

We therefore ask that the record be published on the register, as redacted, by 4.00 pm on Friday 17 July 2026, or that the Council set out in writing the legal basis on which an objector's representation is being excluded from the register at the applicant's request.

This letter is for the public planning file. We note separately that our request for a standstill undertaking, with a response requested by 4.00 pm today, remains outstanding.

Yours sincerely,

Christ's Lane Action Group
residents@christs-lane.com

Attachments: Bursar letter to residents, 11 June 2026 (redacted); DCF refusal email, 8 July 2026 (redacted)

From: Vanessa Blane <Vanessa.Blane@3csharedservices.org>
Date: 16 July 2026 at 18:28:10 GMT+5:30
To: Christ's Lane Action Group <residents@christs-lane.com>
Subject: Christ College Library - St Andrews Street, Cambridge 2555204

Dear Christ Lane Action Group,

Further to your request for publication of documents.

I can confirm that that the requested documents (redacted where necessary) are now in the process of being uploaded onto the Council's planning portal, with the exception of the transcript of the meeting held at Christ College on the 6 July. You will note from the email below that the college objects to its inclusion for the reasons detailed in the email.

Please allow time for the process of uploading the documents to be completed.

Kind regards

Vanessa Blane

Vanessa Blane
Senior Planning Lawyer
3C Shared Services – Legal Practice
(Corporate Group)

3C Shared Services – Legal Practice

20/08/2026

Telephone: [REDACTED]

Email: vanessa.blane@3csharedservices.org

Main Office Address: South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

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3C Shared Services is a strategic partnership between Cambridge City Council, Huntingdonshire District Council and South Cambridgeshire District Council

From: [REDACTED]
Sent: 16 July 2026 09:11
To: Vanessa Blane <Vanessa.Blane@3csharedservices.org>
Subject: Planning Register - Christ's College Application

Dear Ms Blane,

The College objects to the inclusion and reliance upon the purported "transcript" of the meeting on the planning register.

The document is derived from a recording made by a third party who did not disclose to those present that the meeting was being recorded. As such, the resulting transcript has not been agreed, verified or approved by the participants and cannot properly be characterised as an official record or minutes of the meeting. Its accuracy, completeness and context cannot therefore be assumed.

We believe that in those circumstances, publication of the transcript on the planning register is inappropriate and procedurally unfair, particularly where it may be afforded evidential weight in the determination of the application. .

The College respectfully requests that the Council does not place the transcript on the public register.

20/08/2026

regards



Partner
Ashtons Legal LLP

t: [Redacted]
m: [Redacted]

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[<~WRD0005.jpg>](#)

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20/08/2026

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CHRIST'S LANE ACTION GROUP

residents@christs-lane.com · www.christslaneactiongroup.org

14 July 2026, by email

To: Vanessa Blane, Senior Planning Lawyer, 3C Shared Services (Legal Practice),
for Cambridge City Council

Copy: Tom Lewis, Head of Legal Practice and Monitoring Officer, Cambridge City Council; Stephen Kelly, Joint Director of Planning and Economic Development, Greater Cambridge Shared Planning; Democratic Services, Cambridge City Council; Emma Dring, Cornerstone Barristers; legal@3csharedservices.org; planning@greatercambridgeplanning.org and PlanningComments@greatercambridgeplanning.org (for upload to the public planning file)

Your ref: 2555204

For the public planning file, application 26/02109/FUL

Dear Ms Blane,

Application 26/02109/FUL, Christ's College Library:
unanswered pre-action correspondence; uncured
consultation defects; the proposal of 14 July 2026 for a same-
day Development Control Forum and committee; request for
a standstill undertaking

We write further to CLAG's Initial Letter Before Claim of 22 June 2026, sent under the Pre-Action Protocol for Judicial Review, and to CLAG's two letters of 7 July 2026. This letter records the Council's continuing silence, sets out the defects that remain uncured as at today's date, addresses the proposal received this afternoon from Democratic Services for a Development Control Forum and Planning Committee on the same morning of 29 July 2026, and seeks a standstill undertaking by **4.00 pm on Thursday 16 July 2026**.

This letter is copied to the Monitoring Officer and to the Joint Director of Planning for the reasons given in section 7 below. We ask that it be uploaded to the public planning file for application 26/02109/FUL on receipt.

1. The Council's silence

The position on correspondence is as follows:

1. CLAG's Initial Letter Before Claim of 22 June 2026 identified nine legal defects and sought the written confirmations in its Section 11 by 5.00 pm on 26 June 2026. Your holding reply of 25 June 2026 deferred a response to the week commencing 29 June; the Council's substantive reply of 2 July 2026 left the central matters unresolved.
2. CLAG's reply of 7 July 2026 sought written confirmation of seven matters by **12 noon on Friday 10 July 2026**: the consultation deadline; the publication of statutory and amenity-society advice; the committee timetable and mode of determination; the daylight and sunlight evidence; the construction and highways material; the treatment in the officer's report of the four conceded grounds; and the Bursar's email of 11 June 2026. That deadline passed four days ago. No response of any kind has been received.
3. CLAG's supplementary letter of 7 July 2026, documenting the consultation-deadline and portal defects and seeking correction by close of business on 8 July 2026 while the stated consultation period was still running, has likewise received no substantive response.
4. On 8 July 2026 at 12:45 you acknowledged CLAG's correspondence in writing and stated: *"a response will be provided week commencing 13 July."* That week has now begun. No response has been provided. Instead, the first communication received from the Council this week is Democratic Services' proposal of today, 14 July 2026 at 12:41, to timetable the application for determination on 29 July; that is, the Council proposes to fix the path to determination **while its own promised legal response to CLAG's pre-action correspondence remains outstanding**.
5. CLAG's letter of 9 July 2026, addressed to you, to the Monitoring Officer and to Democratic Services and copied to the Joint Director of Planning, sought by 12 noon on 10 July 2026 the legal authority for the DCF refusal of 8 July and **a standstill undertaking that no step capable of advancing the determination of the application would be taken** until that refusal had been withdrawn or lawfully reconsidered. Your reply of 9 July 2026 at 14:53 conveyed the Director of Planning's decision that a forum will be held, but answered none of the letter's numbered requests and gave no standstill undertaking. Five days later, the step that undertaking was

designed to prevent, the listing of the application for determination, has been proposed.

A local planning authority facing pre-action correspondence which identifies specific, documented illegality, on an application whose predecessor it has agreed should be quashed on all four grounds, cannot simply decline to answer while simultaneously moving the application towards committee. Still less can it do so after promising a response in writing and, before providing it, proposing the very timetable the correspondence contests. The silence is itself now a matter we will place before the court.

2. The consultation deadline: a documented defect, silently and only partially corrected

The facts are now established by the Council's own documents:

1. The Council's statutory notification letter to the occupier of 21 Christ's Lane, dated **1 July 2026** and signed by Dominic Bush, states: *"You should ensure that your written comments are received by 22 July."* Under Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the 21-day period runs from the last notification. The operative deadline for the entire application is therefore 22 July 2026. That letter has itself been published on the portal since 1 July 2026, as "Consultation Notification Sent to Additional Properties": from 1 July until this afternoon, the Council's own portal therefore simultaneously displayed a published statutory letter giving 22 July and an expiry date of 9 July. The Council's internal record of that notification, also published on the portal on 1 July 2026 as "Confirmation of Neighbour Consultation/Notification", shows that the instruction came from the case officer himself: Mr Bush asked that consultation letters be sent to four addresses (66 St Andrew's Street and 19, 20 and 21 Christ's Lane), and the Technical Support Officer confirmed to him, attaching a copy of the letter, *"I have attached a copy of the neighbour letter sent to the addresses below."* (enclosure 3b).
2. Notwithstanding that letter, the Council's public portal displayed **9 July 2026** as the expiry date continuously until this afternoon. A screenshot taken at **13:33 on 14 July 2026** shows the portal still displaying 9 July, a date which had by then already passed. A second screenshot taken at **14:15 today** shows the date changed to 22 July. Both screenshots are enclosed and will be exhibited in any proceedings.

3. On 7 July 2026 at 10:47, fifteen days before the actual deadline, the case officer, Mr Bush, refused in writing a member of the public's request for more time, made in reliance on the 9 July date he had been given: *"I am afraid we are unable to extend the deadline for submissions for any of the reasons that you have given."* That is the same officer who had, six days earlier, signed the statutory letter giving 22 July, and who had personally instructed its despatch and received written confirmation that it had been sent (enclosure 3b). Among the reasons given was that the requester wished to read Historic England's response before commenting; Mr Bush confirmed in the same email that Historic England's comments had not yet been received. That response was published on 8 July, the day before the deadline the public had been told. The email chain, which shows the request had been raised with three officers over the preceding four days, is enclosed, redacted to remove the requester's personal details; the unredacted original is in the Council's possession.
4. This was not a clerical slip. The Council's written comments of 2 July 2026, provided under cover of your own email (both enclosed) stated in terms that *"the consultation period will run until the 9 July and residents have been made aware of this"*, after the re-notification letters giving 22 July had been issued. The incorrect deadline was maintained in writing, by the authority's officers and in its legal correspondence, in the face of the Council's own statutory notices.

The silent correction of the portal this afternoon does not cure the defect. The requirements of lawful consultation (*R v Brent LBC ex parte Gunning* (1985) 84 LGR 168, approved in *R (Moseley) v Haringey LBC* [2014] UKSC 56) include that consultees be given accurate information and adequate time. Persons who were told the wrong deadline, including at least one member of the public refused an extension in writing, have received no correction. The number of others similarly misled is unknown and, so far as we are aware, has not been investigated.

We therefore require the Council to: (a) issue a published corrective notice to all previously notified persons confirming 22 July 2026 as the single operative deadline; (b) write directly to the member of the public who was refused an extension on 7 July, correcting the advice given; and (c) confirm in writing the date, time and authority on which the portal entry was changed this afternoon.

- a) A corrective notice was issued on the 14th July to all notified parties
- b) The case officer contacted the member of the public on the 15 July to clarify the point that comments on the planning application could be received by 22 July.
- c) The portal was updated on the 15th July to clarify the expiry date of the 22nd.

3. Statutory consultee and amenity society advice remains misfiled and unpublished

1. **The Gardens Trust.** The Trust is the statutory consultee for development affecting a registered park or garden under Schedule 4, paragraph (s) of the 2015 Order; Christ's College grounds are a Grade II Registered Park and Garden. Its response of 6 July 2026 was filed on the portal as a **public comment**, as reported to the Council in CLAG's supplementary letter of 7 July 2026. That misfiling has not been corrected: the portal document list as at 15:14 today (enclosed) still contains no consultee entry for the Gardens Trust. Statutory consultee advice carries a distinct legal character under Articles 18 and 22, and an officer's report written against a record which presents it as one lay representation among many will mislead members: *R (Loader) v Rother District Council* [2016] EWCA Civ 795 is directly in point.

The response of the Garden Trust is now visible under "Public Comments" but also under "Documents" as a "Consultee Comment"

2. **The Victorian Society.** CLAG's supplementary letter of 7 July 2026 recorded that the Society's response of 6 July 2026, which addresses and rejects the central proposition of the applicant's Covering Statement on sections 66 and 72, could not be found on the portal. The portal document list now records that response as a consultee comment with a published date of 6 July 2026. Those two facts cannot both be right on their face. Please confirm in writing, from the portal's audit trail, the actual date and time the document was uploaded and made publicly visible, and reconcile that with the published date now displayed.
3. **CLAG's own submissions.** Two CLAG submissions for the public planning file remain unpublished: (a) CLAG's covering letter of 9 July 2026 enclosing the record of the College's public consultation meeting of 6 July 2026, submitted on 9 July 2026; and (b) CLAG's objection founded on the judicial review grounds, with its covering letter, submitted on 10 July 2026. Neither appears on the enclosed document list. Please confirm both will be published forthwith.

CLAG's letter of 9 July and the record of the College's public consultation have not been uploaded, however CLAG's letter and amended record as sent to the Council on the 17 July are both in the process of being uploaded. The letter of the 10 July has been uploaded.

4. **Historic England.** We note that the portal records Historic England's response as published on 8 July 2026, in three parts. The request in CLAG's letter of 7 July 2026 for confirmation of Historic England's position is to that extent overtaken, and we acknowledge as much.

4. The proposal of 14 July 2026: a Development Control Forum and Planning Committee on the same morning

Democratic Services' email of today proposes a Development Control Forum at 10.00 am on 29 July 2026, "a comfort break for councillors", and the Planning Committee "some time after 11:30am" the same morning. We invite the Council, and specifically its legal advisers, to explain in writing how this proposal is said to be lawfully allowable. In our analysis it is not, for the following reasons.

First, it is outside the scope of the Director's decision. On 9 July 2026 you wrote confirming that the Director of Planning, having reviewed CLAG's request "and noting the strict compliance with the requirements for such a scheme", had determined that a DCF will be held. What the Director reinstated was the forum contemplated by the Council's published procedure. He did not, and could not lawfully, authorise a forum emptied of its published purpose. Democratic Services' email records only that it "was not possible" to hold the forum on 21 July; it identifies no reason why the forum must instead share a morning with the committee, rather than precede it by the interval the published procedure requires.

Second, it contradicts the Council's own published procedure. The published DCF procedure states that the forum is a meeting held "**some weeks before** a planning application is finally determined", whose aim is "to allow **early** discussion of the planning issues raised by petitioners and to explore the scope for building consensus and resolving concerns". The Statement of Community Involvement, adopted under section 18 of the Planning and Compulsory Purchase Act 2004, is in the same terms. A published procedure of this kind founds a legitimate expectation which the authority must honour absent cogent, publicly stated reasons for departure: *R (Majed) v Camden LBC* [2009] EWCA Civ 1029; *R (Nadarajah) v Secretary of State for the Home Department* [2005] EWCA Civ 1363. No reason of any kind has been stated.

Third, it defeats the forum's purpose as a matter of function. By 10.00 am on 29 July the officer's report will already have been published and fixed. No finding of the forum could inform that report; no concern could be explored, still less resolved, in a 90-minute interval before members vote. A procedural step must be exercised for its stated purpose; discharge in name only is no discharge: *CCSU v Minister for the Civil Service* [1985] AC 374. The proposal reduces the forum the Director reinstated to a formality.

Fourth, the timetable is structurally incapable of producing a lawful decision, on the Council's own stated figures. The consultation period closes on 22 July. The Council's comments of 2 July 2026 state that the officer's report "will be published in the normal way, which will be 5 days before the Planning Committee". For a committee on 29 July, that is on or about 22 July: **the day the consultation closes.** On the Council's own account, the report would be finalised and published before the representations it is required to weigh could be read: representations arriving on the final day, the Gardens Trust's statutory advice (for which the Council's own comments give a response date of 14 July), and the material still unpublished or misfiled per section 3 above. The officer's obligation to take reasonable steps to bring material considerations, including late representations, to members' attention (*Kides v South Cambridgeshire DC* [2002] EWCA Civ 1370) cannot be discharged by a report that predates them; and the report must identify the four grounds on which the Council has conceded the predecessor permission was unlawful and explain, ground by ground, how each has been corrected (*Mansell v Tonbridge and Malling BC* [2017] EWCA Civ 1314). Publication five clear days before the meeting under section 100B of the Local Government Act 1972 is a statutory floor, not a measure of fairness. Nor is there any statutory time pressure capable of explaining the compression: the Council's own portal records the determination deadline for this application as **9 September 2026** (enclosures 1 and 2). This is precisely the compression which, on the predecessor application, carried the conceded errors to members uncorrected. To reproduce it, on a materially identical scheme, with the substantive hearing in AC-2025-LON-004656 listed for 20 October 2026, would be to repeat conceded illegality with knowledge.

5. The applicant's private communications must be placed on the public file

On 8 July 2026 at 08:03 the College's Bursar emailed the Development Manager declining to participate in the DCF, and this was the sole stated basis on which CLAG's petition (compliant in every respect, with 75 signatories) was refused at 14:10 the same day. The published procedure confers no applicant veto; the Director's reversal implicitly accepts as much. We acknowledge that this email chain is on the public file, published on 8 July 2026 as officer correspondence ("DCF Request Response TW – CLAG"). The Bursar's earlier email to officers of **11 June 2026**, however, is not: it appears nowhere on the enclosed document list. A private communication from an applicant to the decision-maker's officers is a lobbying communication which belongs on the public record, as the Council itself

evidently accepts, having published the 8 July chain: *R v North Devon DC ex parte Lewis* [1981] 1 WLR 328; *R (Hossack) v Kettering BC* [2002] EWCA Civ 886; and see section 25 of the Localism Act 2011. There is no principled basis on which one of the Bursar's communications is published and the other withheld. We require written confirmation that the email of 11 June 2026 has been placed on the public planning file.

The Bursar's email of 11 June has been published on the planning portal.

Standstill undertaking sought

CLAG sought a standstill undertaking in its letter of 9 July 2026. It was not given, and it was not refused; it was ignored. The proposal of 14 July demonstrates why it was necessary. CLAG therefore renews the request in wider terms. We seek the Council's written undertaking, by **4.00 pm on Thursday 16 July 2026**, that it will not report application 26/02109/FUL to committee, nor otherwise determine it, until:

1. a substantive response has been given to the Initial Letter Before Claim of 22 June 2026 and to both of CLAG's letters of 7 July 2026;
2. the consultation defects identified in sections 2 and 3 above have been cured, including the published corrective notice, the direct correction to the misinformed member of the public, the reclassification of the Gardens Trust response, and the publication of all outstanding statutory, amenity-society and CLAG material;
3. a Development Control Forum has been held in accordance with the Council's published procedure, that is, some weeks before any committee at which the application is considered;
4. the officer's report has been published at least 14 days before any such committee, so that consultees and the public can verify, before members meet, whether each of the four conceded grounds has been corrected; and
5. the Bursar's email of 11 June 2026 has been placed on the public planning file.

The Council has provided a response in respect of points 1,2,3 & 4.

To confirm the response made to CLAG's letter of 7 July. - The report will be published in line with statutory requirements and the Council's procedure which is five days prior to the Planning Committee.

The undertaking sought imposes no prejudice on the Council or the applicant beyond the time needed to conduct a lawful process: the determination deadline

recorded on the Council's own portal is 9 September 2026, within which a lawful sequence of consultation, forum, report and committee fits comfortably. If it is not received by the time stated, interim relief will be sought under CPR Part 54 restraining determination of the application pending compliance. No further warning will be given before any such application is made, and CLAG will place before the court this letter, the unanswered letters of 22 June, 7 July and 9 July

2026, and the Council's written statement of 8 July 2026 that a response would be provided in the week commencing 13 July, both on the application and on the question of costs. The balance of convenience on such an application is plain: the harm from an unlawful determination affecting Grade I and Grade II* listed buildings is irreversible; the cost of delay pending a lawful process is temporary and of the Council's own making.

6. Why this letter is copied to the Monitoring Officer and the Joint Director of Planning

This letter is copied to Mr Lewis in his capacity as Monitoring Officer, having regard to the duty under section 5 of the Local Government and Housing Act 1989 to consider a report where a proposal or decision of the authority has given rise to, or is likely to give rise to, a contravention of an enactment or rule of law. The matters set out above are squarely within that duty: a documented misstatement of a statutory consultation deadline maintained on the public record until this afternoon; misfiled statutory consultee advice; a procedural decision made on the basis of an off-record applicant veto; and a proposal to collapse a published procedural safeguard into the same morning as the decision it exists to inform.

It is copied to Mr Kelly because the proposal of 14 July 2026 appears inconsistent with his own decision, communicated by you on 9 July 2026, that a Development Control Forum will be held, and he should be aware of the use being made of that decision. Both Mr Lewis and Mr Kelly were addressees of, or copied on, CLAG's letter of 9 July 2026; this letter continues that correspondence.

All of CLAG's rights are reserved, including in respect of the substantive hearing listed for 20 October 2026 in claim AC-2025-LON-004656. This letter is placed on CLAG's public record and will be relied upon in any subsequent proceedings.

Yours sincerely,

Christ's Lane Action Group

residents@christs-lane.com · www.christslaneactiongroup.org

Enclosures:

1. Portal screenshot, 14 July 2026, 13:33 (expiry date shown: 9 July 2026)
2. Portal screenshot, 14 July 2026, 14:15 (expiry date shown: 22 July 2026)
3. Council notification letter to 21 Christ's Lane, 1 July 2026 (deadline stated: 22 July 2026), together with the Council's internal confirmation of despatch

("Confirmation of Neighbour Consultation/Notification", published 1 July 2026)

4. Email chain of 7 to 8 July 2026 (DCF refusal following the Bursar's email)
5. Democratic Services email of 14 July 2026 (same-day DCF and committee proposal), redacted to remove a resident's personal details
6. CLAG letters of 7 July 2026 (reply and supplementary letter)
7. Vanessa Blane email of 8 July 2026, 12:45 (response promised week commencing 13 July)
8. CLAG letter of 9 July 2026 and Vanessa Blane reply of 9 July 2026, 14:53 (DCF reversal; standstill request unanswered)
9. Portal document list for application 26/02109/FUL, captured 14 July 2026, 15:14
10. Email chain of 3 to 7 July 2026 (member of the public's extension request; refusal by the case officer, 7 July 2026, 10:47), redacted
11. Portal public-comments page, showing the Gardens Trust response of 6 July 2026 filed as a public comment, marked "Neutral"
12. Vanessa Blane email of 2 July 2026, 16:58 (with holding reply of 25 June 2026), enclosing the Council's response comments of 2 July 2026 ("Points raised by CLAG re second application with Council response comments")

20/08/2026

Subject: Fwd: Christ College Library - St Andrews Street, Cambridge (2555204)
From: "Christ's Lane Residents" <residents@christs-lane.com>
Sent: 22/07/2026, 19:40:04
To: [REDACTED]
Attachments: CLAGS letter of 7 July with Council response - 21.07.2026.pdf; CLAG's letter to Vanessa Blane of 14 July with Council's response - 21.07.2026.pdf

Sent from my iPhone

Begin forwarded message:

From: Vanessa Blane <Vanessa.Blane@3csharedservices.org>
Date: 22 July 2026 at 21:23:44 GMT+5:30
To: Christ's Lane Action Group <residents@christs-lane.com>
Subject: Christ College Library - St Andrews Street, Cambridge (2555204)

Dear Christ Lane Action Group,

Further to your correspondence of 7 and 14 July.

Please find attached a copy of the Council's responses to the points you raise in your letters of the 7 and 14 July. Where no response is made on the letter of the 14 July, these particular points will have been covered off in the response to points raised in letter of 7 July.

Kind regards

Vanessa Blane

Vanessa Blane
Senior Planning Lawyer
3C Shared Services – Legal Practice
(Corporate Group)

3C Shared Services – Legal Practice



Telephone: [REDACTED]
Email: vanessa.blane@3csharedservices.org

Main Office Address: South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

The address above is the only address for service of correspondence unless expressly otherwise stated.

Any correspondence addressed or sent to an alternative address will not be considered or accepted as effective service.

We do accept service by Email but only to the following address: legal@3csharedservices.org

3C Shared Services is a strategic partnership between Cambridge City Council, South Cambridgeshire District Council and Huntingdonshire District Council

20/08/2026

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about:srcdoc

From: Stephen Kelly <stephen.kelly@greatercambridgeplanning.org>
Date: 20 August 2026 at 20:10:48 GMT+5:30
To: residents@christs-lane.com
Cc: SPOCChristsLane <SPOCChristsLane@greatercambridgeplanning.org>
Subject: Christs Lane Action Group

Dear Christs Lane Action Group

I am writing to you in connection with the ongoing engagement between the Christs Lane Action Group (CLAG) and the Council concerning recent and current planning proposals by Christs College Cambridge for development at their site.

In recent months, as the planning proposals have progressed, a very significant volume of material has been submitted by CLAG to a number of different officers across the Greater Cambridge Shared Planning Service (GCSP) and City Council pursuant to the planning application process. I have also noted concerns expressed to myself and others by CLAG that some correspondence has been missed and information has not been coordinated or responded to in a timely manner.

In recognition of those concerns, and the desire to enable an efficient and effective process for considering and where necessary responding to submissions from CLAG, I have decided to put in place arrangements to ensure the service we provide to you is cohesive, comprehensive, and proportionate.

From Monday 21st August 2026, I am therefore proposing to introduce for CLAG a Single Point of Contact (SPOC) arrangement for all enquiries and/or service requests in respect of both the current and former planning and related applications by Christs College. This includes submissions to Cambridge City Council Legal Services/3C Legal, the Greater Cambridge Shared Planning Service and any other correspondence to City Council departments on this matter. The SPOC facility is being provided by South Cambridgeshire District Council to the Greater Cambridge Shared Planning Service because in this case the need relates to a planning matter which primarily rests with the Shared Planning Service.

Your SPOC is Laura. Her contact details are:

Email: SPOCChristsLane@greatercambridgeplanning.org

Address:

SPOC for Christs Lane:
Transformation Service.
South Cambridgeshire Hall,
Cambourne Business Park,
Cambourne,
Cambridge
CB23 6EA

This means that you should in future send all communications with the Council on all matters relating to development at Christs College to the SPOC. I will also be putting in place arrangements within the Council to ensure that emails are directed to the SPOC. This includes service requests, complaints and requests for information. All information submitted will be promptly reviewed by the SPOC and directed to relevant officers including legal services officers for action where required. A response will then be provided to you, where required, by way of a single weekly update. In the case of material to be uploaded onto the application file, this will be undertaken promptly where required following review. To ensure responses are comprehensive and to avoid misunderstandings communication will not be undertaken by telephone.

Firefox

about:srcdoc

Please note that under these arrangements, you will usually receive a response to any communication from your SPOC once a week, although exceptions will be made to this rule if required to ensure the Council fulfils its service and legal obligations.

I can also confirm that notwithstanding these arrangements any Freedom of Information (FOI) or Environmental Impact Report (EIR) requests you make will be dealt with in accordance with the relevant legislation.

The Greater Cambridge Shared Planning Service will keep these arrangements under review. You will receive 14 days' notice from the SPOC about any changes in these arrangements or if the SPOC arrangement is discontinued.

The SCDC SPOC Protocol is published on the South Cambridgeshire District Council website and can be found using the following link: [SPOC Protocol \(scambs.gov.uk\)](https://scambs.gov.uk). You may want to take time to familiarise yourself with our protocol.

I hope the information contained in this email is clear and comprehensive and that the arrangements that we have put in place will address earlier concerns from CLAG as well as ensure we can provide the comprehensive management of correspondence between CLAG and the Council required in this case. If you have any questions about the arrangements, please do contact the SPOC on the email address given above.

Yours faithfully

Stephen Kelly MBE
Director of Planning

<image001.png>

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21/08/2026

Subject: Fwd: Christs Lane Action Group SPOC - Correction.
From: "Christ's Lane Action Group" <residents@christs-lane.com>
Sent: 21/08/2026, 09:59:22
To: [REDACTED] [REDACTED]

----- Forwarded message -----

From: **Stephen Kelly** <Stephen.Kelly@greatercambridgeplanning.org>
Date: Fri, 21 Aug 2026 at 12:01
Subject: Christs Lane Action Group SPOC - Correction.
To: residents@christs-lane.com <residents@christs-lane.com>
Cc: SPOCChristsLane <SPOCChristsLane@greatercambridgeplanning.org>

Dear Christs Lane Action Group

Further to my email of 15.41 yesterday (20th August), I have noted an error in the day/date for the implementation of the SPOC. Please accept my apologies for any confusion and note the correction/clarification below.

I am writing to you in connection with the ongoing engagement between the Christs Lane Action Group (CLAG) and the Council concerning recent and current planning proposals by Christs College Cambridge for development at their site.

In recent months, as the planning proposals have progressed, a very significant volume of material has been submitted by CLAG to a number of different officers across the Greater Cambridge Shared Planning Service (GCSP) and City Council pursuant to the planning application process. I have also noted concerns expressed to myself and others by CLAG that some correspondence has been missed and information has not been coordinated or responded to in a timely manner.

In recognition of those concerns, and the desire to enable an efficient and effective process for considering and where necessary responding to submissions from CLAG, I have decided to put in place arrangements to ensure the service we provide to you is cohesive, comprehensive, and proportionate.

*From **Friday** 21st August 2026, I am therefore proposing to introduce for CLAG a Single Point of Contact (SPOC) arrangement for all enquiries and/or service requests in respect of both the current and former planning and related applications by Christs College. This includes submissions to Cambridge City Council Legal Services/3C Legal, the Greater Cambridge Shared Planning Service and any other correspondence to City Council departments on this matter. The SPOC facility is being provided by South Cambridgeshire District Council to the Greater Cambridge Shared Planning Service because in this case the need relates to a planning matter which primarily rests with the Shared Planning Service.*

Your SPOC is Laura. Her contact details are:

Email: SPOCChristsLane@greatercambridgeplanning.org

Address:

SPOC for Christs Lane:

Transformation Service.

South Cambridgeshire Hall,

Cambourne Business Park,

Cambourne,

Cambridge

CB23 6EA

21/08/2026

This means that you should in future send all communications with the Council on all matters relating to development at Christ's College to the SPOC. I will also be putting in place arrangements within the Council to ensure that emails are directed to the SPOC. This includes service requests, complaints and requests for information. All information submitted will be promptly reviewed by the SPOC and directed to relevant officers including legal services officers for action where required. A response will then be provided to you, where required, by way of a single weekly update. In the case of material to be uploaded onto the application file, this will be undertaken promptly where required following review. To ensure responses are comprehensive and to avoid misunderstandings communication will not be undertaken by telephone.

Please note that under these arrangements, you will usually receive a response to any communication from your SPOC once a week, although exceptions will be made to this rule if required to ensure the Council fulfils its service and legal obligations.

I can also confirm that notwithstanding these arrangements any Freedom of Information (FOI) or Environmental Impact Report (EIR) requests you make will be dealt with in accordance with the relevant legislation.

The Greater Cambridge Shared Planning Service will keep these arrangements under review. You will receive 14 days' notice from the SPOC about any changes in these arrangements or if the SPOC arrangement is discontinued.

The SCDC SPOC Protocol is published on the South Cambridgeshire District Council website and can be found using the following link: [SPOC Protocol \(scambs.gov.uk\)](https://scambs.gov.uk). You may want to take time to familiarise yourself with our protocol.

I hope the information contained in this email is clear and comprehensive and that the arrangements that we have put in place will address earlier concerns from CLAG as well as ensure we can provide the comprehensive management of correspondence between CLAG and the Council required in this case. If you have any questions about the arrangements, please do contact the SPOC on the email address given above.

Yours faithfully

Stephen Kelly MBE

Director of Planning

21/08/2026



Disclaimer

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- (a) That representations in the current re-consultation, from CLAG or any resident, will be accepted through the statutory channels open to every member of the public, placed on the application file promptly and without editorial review, and considered by the case officer within the window, in accordance with the adopted Statement of Community Involvement.

All representations from CLAG will be directed to the SPOC. Any representations made by the public should be made via the public comments section on the public portal. All representations will be reviewed (in line with the Councils normal screening for inappropriate language/terms etc) and placed online promptly.

- (b) That the weekly cycle defers no statutory or stated deadline, and that each of the following is answered on its own terms: the letter of 7 August 2026, now overdue; the three letters of 13 August 2026; the matter before the Monitoring Officer, due 21 August 2026; the confirmations requested in CLAG's letter of 20 August 2026, due 26 August 2026; the confirmation that no element of the arrangement will be operated, due by close of business on Monday 24 August 2026; these confirmations, due by Wednesday 26 August 2026.

To ensure that a single consistent response is provided to CLAG, all responses that are or become due to CLAG will be made by the appropriate officer and sent to CLAG via the SPOC once a week.

- (c) That the conduct, service and timescales of correspondence in AC-2025-LON-004656 are wholly unaffected, with service per your lawyer's stated address.

The imposition of the SPOC does not affect the service and timescales of correspondence in AC-2025-LON-004656.

- (d) That FOI and EIR requests will be answered within their statutory periods whatever channel they arrive by, and that inspection rights under the Local Government Act 1972 are unaffected.

Any request pursuant to FOI and/or EIR requests will be answered within their statutory periods via the SPOC, inspection rights under the Local Government Act 1972 are unaffected by the imposition of the SPOC.

- (e) That communications with elected members and with the Monitoring Officer are unaffected.

CLAG retains the right to communicate as it wishes with elected members. All correspondence to the Council's monitoring officer will be directed to the SPOC and all responses to CLAG will be made by the appropriate officer, via the SPOC.

- (f) The SPOC's full name and role; the named deputy with contact details; the criteria and identity of any review of material before upload; the identity of the body keeping the arrangement under review and the terms of that review; the operative start date, given the correction of 21 August.

The operative start date for the SPOC is Friday 21st August. The Council is not required to release to CLAG the name of the SPOC, or their deputy. Reference to review of material before uploading in the emails of 20th and 21st August related to the need to identify any required actions and questions requiring a response and to screen, as per all incoming mail displayed by the Council online, for any inappropriate language or term or personal data (which are then redacted). The Council is the body responsible for keeping the arrangement under review and the terms of that review.

- (g) The decision record, authorisation, equality assessment, data processing particulars and any data protection impact assessment (sections 8.3 and 8.8).

The decision to introduce a SPOC was made by the Joint Director of Planning in consultation with the Executive Leadership Team of the Council to improve the management of communications between CLAG and the Council. The imposition of the SPOC does not seek to and will not restrict CLAG's ability to correspond with the Council. The Council will continue to act in accordance with all statutory provisions, including the Equality Act 2010.

- (h) That the register entries at sections 6.3.1 and 6.3.2 will be corrected to display upload dates; the portal audit trail for both (upload date, display date as first set, each change, the officer instruction for each); and that the officer's report will record the true chronology of both, and the status of the sealed order of 6 March 2026, transmitted 15 June 2026 and absent at CLAG's timed inspections.

The Council will manage the public planning portal in accordance with statutory requirements. The officer report will be written to address all material planning considerations relevant to the determination of the current application.

- (i) That the officer's report will be prepared under the August 2026 Framework, discharging HE5(4), with any conditions previously "minded to" be

recommended re-examined against it, and stating the figures confirmed on 31 July 2026; and the committee date now operative, given the Council's statements of 28 July (2 September "whether or not the High Court has issued a decision") and 18 August ("likely to be delayed until after the 2 September").

The officer's report will be prepared under the August 2026 NPPF. The officer report will refer to the planning conditions to be imposed in the event that there is a recommendation that the application should be approved.

- (j) Whether either council has designated CLAG, or any of its members, unreasonably persistent or vexatious, or made any finding of unreasonable behaviour: if yes, the records at section 8.2; if no, written confirmation that no such designation or finding exists.

The Council has not designated CLAG or any of its members unreasonably persistent or vexatious, nor has it made any finding of unreasonable behaviour. The purpose of the SPOC was to implement a means to ensure the effective management of correspondence and service requests from CLAG alongside the Councils other operational activities.



South
Cambridgeshire
District Council

SPOC Protocol

Background

Most interactions between the Council and residents or businesses will involve single or low impact regular interactions (for example, a resident making a noise complaint or a benefit claimant reporting changes in their income). However, there can be situations where interactions can last for several months. An example of this would be in the case of a major planning application which sparks regular contact between the Council, the developer, consultees, and objectors or supporters. These types of interactions are predictable and can be managed either through BAU (business as usual) processes or by the provision of additional paid for services such as a Planning Performance Agreement (PPA).

Sometimes the council receives a very high level of contact from an individual or an organisation over an extended period that cannot easily be managed by the Council's BAU arrangements, and where the individual or organisation is unable or unwilling to purchase additional paid for services.

This protocol outlines how the Council will deal with these situations in a way that looks to ensure the service we provide is cohesive, comprehensive, and proportionate. We will also make sure that resources are not unreasonably diverted away from other residents and organisations that also need to access Council services.

For situations such as these, we will set up a Single Point of Contact (SPOC) within the Council who will be responsible for communicating with the identified person or organisation, ensuring that all enquiries and service requests are coordinated across the Council and delivering a cohesive level of service that is consistent with the service provided to all other customers of the Council.



Arrangements

The SPOC arrangements will be as follows: -

- The Council will nominate one officer to be the SPOC for the identified resident or organisation.
- The Council will ensure that a deputy is also identified so that the level of service provided is maintained when the SPOC is absent for leave, sickness, training etc.
- The Council will provide the identified resident or organisation with the SPOCs email address and contact details for physical mail.
- Officers will be asked to forward any emails or physical mail received from the identified resident or organisation to the SPOC. This is to cover situations such as technical or administrative error, or the use of a previously unidentified email address from the identified resident or organisation.
- Members will be informed of the SPOC and be given the option to forward any emails or physical mail that they receive to the SPOC for reply, although this will be their choice.
- To ensure responses are comprehensive and to avoid misunderstandings, communication will not be done by telephone. This is because it is important that all communications are fully recorded and understood, and that there is a common record of the substance and nature of these communications.*
- The SPOC will identify which contacts from the resident or organisation need a response, which officer is best placed to provide the required information



and will then obtain that information and produce a coordinated weekly response.

- Where the communication between the Council and the identified resident or organisation requires the involvement of the legal service, the SPOC will request services via the Deputy Head of Legal (with the advice of the relevant technical experts) and the commissioning officer will be the Head of Transformation, HR and Corporate Services.
- To ensure a structured comprehensive dialog with the identified resident or organisation, the SPOC will issue a weekly response with all the information available to them at time of writing. Where the SPOC is awaiting details from another Council officer on an issue at the time of sending the weekly response, the response to that issue will be included in the following week's response.
- The SPOC will copy all appropriate officers (and relevant members) into the weekly response to ensure all are kept informed of developments.
- On occasion, the SPOC will decide that a particular issue should be dealt with outside of the regular timescales and initiate a single-issue response. This will normally only be initiated where it is needed to meet statutory timescales.
- The normal timescales for responding to individual enquiries and service requests will apply to responses by the SPOC.
- Freedom of Information (FOI) and Environmental Impact Regulation (EIR) requests made by the identified resident or organisation will be undertaken by the information team shared by Huntingdon District Council, South Cambridgeshire District Council, and Cambridge City Council. We will ask that the request be addressed to the SPOC in the first instance and the response will be sent back to the identified resident or organisation via the SPOC in the



usual way (normally as part of the weekly response). The usual timescales will apply to FOI/EIR requests.

- Should the level of enquiries or service requests from the identified individual or organisation reduce to the level more normally received, the SPOC can – after informing the identified individual or organisation, relevant officers of the Council and appropriate members – terminate the SPOC arrangements with two weeks' notice. The SPOC arrangements can be reinstated at any time should the level of enquiries increase again to the level where the SPOC arrangements allow the most equitable and efficient delivery of service.
- When a SPOC has been put in operation its continued need will be reviewed by Leadership Team after 6 months.

* Where the identified resident or organisation representative has a disability requiring they use the telephone to communicate then telephone communication can be undertaken at the SPOC's discretion. Where the identified resident or organisation wishes to verbally request information under the Environmental Information Regulations this can be done via the call centre and the request will be forwarded to the SPOC.