CLAG: the DCF record (25 September 2026)

The Council held the Development Control Forum of 29 July 2026 (the DCF) on this application, published its recording, and on 21 September 2026 published its minutes in 114 numbered items ("the minutes", cited by item number), which it will append to the officer's report. This record gives, entry by entry, the words spoken there on which CLAG's papers rely, beside the minutes' item that carries each. Where the minutes leave words out or change them, CLAG has asked the Council to correct the minutes, and the record stands on the recording whether or not it does. The Council's own case officer told members that Historic England's comments "clearly stated that they had concerns regarding the scale and bulk of the building" and that the conservation officer found the heritage benefits "not sufficient to outweigh the heritage harm" (items 79 and 80). Christ's College's ("the applicant") words are recorded only where they admit or contradict something. Each section states the error a report would make on these words, and names the paper in which CLAG makes the finding.

Submitted for the public register of application 26/02109/FUL, to be recorded under the heading above and displayed on the day it reaches the Council, Friday 25 September 2026: the Council's notice of 19 August 2026 states that views are "published onto the website promptly" (document 9499001), and the applicant's letters of 5 and 27 August 2026 were displayed within a day (documents 9486713 and 9506331).

Application 26/02109/FUL: land at Christ's Lane, Cambridge (demolition of the existing library building and construction of a replacement). Christ's Lane Action Group (CLAG). One exhibit is filed with it: Exhibit E3b, CLAG's technical note on the light in the lane at night, promised at entry 4.22. Quotations are verbatim from the document cited, and documents are cited by their numbers on the register of this application unless another register is named.

To: planning@greatercambridgeplanning.org and PlanningComments@greatercambridgeplanning.org, for the attention of Dominic Bush (case officer); copy Vanessa Blane (Senior Planning Lawyer, 3C Shared Services); copy Stephen Kelly (Joint Director of Planning and Economic Development, Greater Cambridge Shared Planning); copy legal@3csharedservices.org (the 3C Shared Legal Practice, the address the Council has stated as its accepted point of service).
From: Christ's Lane Action Group (residents@christs-lane.com).
Filed Friday 25 September 2026.

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6. The public access the applicant offered members in words results from any library on the site, not from this building's bulk, is in no application document and is secured by nothing, so under the NPPF's public benefits balance, HE6(4), it cannot be weighed against the harm this building causes
7. The bench, the gate and the light at night, stated to members as benefits, are "minor" and "possible" in the applicant's documents, measured nowhere, delivered by any library on the site, so under the NPPF's public benefits balance, HE6(4), none can be weighed against the harm this building causes
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Index of entries by number

1. The Council's recording is the source of every entry, the Council's minutes carry some of the words and not others, and a correction of the minutes has been requested, so every paper cites the record whether or not the minutes are corrected

1.1 The source. Every entry gives words spoken at the DCF as the Council's recording of it carries them. The recording is published on the Council's YouTube channel ("DCF Meeting 29/07/2026 10am", https://www.youtube.com/watch?v=wKx49TGqlIE) ("the webcast"); a place in it is given in hours, minutes and seconds from its start, to within a few seconds. The chair said at the opening that the meeting "is automatically recorded and will be available for public viewing for six months from the date of the meeting" (0:17:33). Two machine transcriptions of the webcast were made, one by CLAG from the sound and one by the webcast's own page. The words of the entries follow the first, corrected from the second where the first is garbled. Where the two differed on a word that matters, the word given is the word heard. Twelve passages were checked against the webcast by ear on 22 September 2026, and the words heard are the words given. They carry entries 3.1, 3.4, 4.6, 4.7, 4.9, 4.13, 4.16, 4.24, 4.26, 4.29, 4.32, 4.36 to 4.38, 4.47, 4.49, 4.50 and 4.51; entries 4.20 and 4.42 were checked by ear on 24 September 2026. The other entries rest on the two transcriptions, which agree on their words.

1.2 The minutes. The Council published its minutes of the DCF on 21 September 2026: 114 numbered items, which the chair said would be "appended to the Planning Officer's report" (item 114(i)). Where the minutes carry the words of an entry, the entry quotes the minutes first and

gives the item number; where the minutes carry the substance in other words, the entry quotes both; where the minutes carry nothing, the entry says “not in the minutes”. The minutes record the members’ questions (items 82 to 100) and none of the applicant’s answers to them, and none of the chair’s undertakings given in the members’ half hour. CLAG’s minutes letter, filed with this record, asks the Council to correct the minutes at the items it lists, before the minutes are appended to any report. This record does not depend on that correction: it stands on the webcast.

1.3 The Council’s own practice. The Council appended its notes of the Development Control Forum of 11 September 2025 on application 25/02161/FUL (“the 2025 DCF”) to the 2025 committee report, with the members’ questions and lettered answers (“the Council’s 2025 notes”, the public reports pack of 29 October 2025, pages 209 to 212). The case officer wrote on 31 July 2026 that a record of the DCF “has not yet been provided but when it has I will also ensure that this accurately reflects my comments”.

1.4 The conventions. Words are given as spoken, with filler words and false starts left out, proper names in their usual spelling, a cut marked by an ellipsis, and words supplied by CLAG in square brackets. Speakers are named by office. The chair is a delivery manager of the Greater Cambridge Shared Planning Service. The Master is the applicant’s presenter, the Master of the College. The applicant’s consultant is its planning and heritage consultant, Turley. The others are the case officer, the applicant’s student presenter, the petitioners’ presenter, the petitioners’ planning consultant, the ward councillor and a councillor. Councillors are not named. The applicant’s words are recorded only where they admit or contradict something; its advocacy is not recorded. Each entry keeps the number it has carried in CLAG’s papers. The new entries are 4.36 to 4.51. Entries 4.3 and 4.11 are withdrawn with their numbers kept, and the index at the end gives every number and its section.

1.5 How CLAG’s papers cite the DCF. Where the minutes carry the words, the paper cites the item, because the minutes are the Council’s own document. Where they do not, the paper cites this record by entry and gives the place in the webcast. No paper states that the minutes contain words they do not contain. The papers named in this record are filed with it: the harm register (Annex C); the Historic England FOI schedule (Annex H); the alternatives, justification and public benefits paper (“the alternatives paper”); the sustainability evidence; the design and development plan paper; the document accuracy letter; the conservation officer letter; the environmental health officer letter; the avoidance and justification letter; the determination timing letter; the case officer letter; the committee papers letter; the register integrity letter; and the minutes letter, which asks the Council to correct the minutes.

1.6 The convening. The petition for the DCF was made on 1 July 2026. The Bursar wrote that the College “is not willing to participate in another DCF in relation to this project” and that “A re-run of that meeting will not generate any new information.” The Council wrote: “The applicant, Christ’s College, has declined to participate.” and “Accordingly, your request for the Council to hold a DCF is declined.” On CLAG’s challenge the Director of Planning reversed the refusal the next day, and the College took part. The register integrity letter, section 1, sets out that record. Source: document 9456113.

2. A report that carries the applicant's "no objection" account of the consultees, and not the harm each found from the building's scale and bulk, identifies no degree of harm under the NPPF's assessment policy, HE5(2)(c), and misleads members: the case officer stated the findings to the same meeting

The applicant's consultant told members that "Historic England did not object nor did the conservation officer" (item 34), and that the College "did not identify harm to the setting of the Bodley". Both statements are accurate: Historic England's letter says "no objection" and the conservation officer ticked that box on the Council's form. Neither is the finding either consultee made. Historic England's comments, appended to its letter, find harm to the significance of the Grade I listed buildings from the building's scale and bulk; the conservation officer finds harm to the setting of the Grade I listed building and benefits not sufficient to outweigh it. HE5(2)(c) of the National Planning Policy Framework of 17 August 2026 ("the NPPF") requires the report to identify the harm and its degree, and HE6(1) and HE6(3) to give the harm great weight. If the report states each finding in the consultee's words, the balance starts from the harm found. If the report gives members "no objection" as the consultees' position, it carries less than its own appendix and misleads members (R (Mansell) v Tonbridge and Malling BC [2017] EWCA Civ 1314, [2019] PTSR 1452 at [42]).

1. Entry 4.36. The applicant's consultant read Historic England's earlier comments to members and said they were confident of what the College had acknowledged. The minutes, item 31: "Historic England had been involved in other a year of discussion and were confident when they said that the college had acknowledged the benefits of removing the basement and glazing from the court and the architectural merits of the current scheme. With this in mind, they did not wish to object to the application." Item 32: "Historic England also welcomed the revisions introduced to the scheme and retained its position of no objection." The webcast (0:39:37 to 0:40:10): "'we also acknowledge the benefits of removing the basement and glazing from the court and the architectural merits of the current scheme. With this in mind we do not wish to object to the application.' That was their first comment. In the second comment they said 'Historic England welcomes the revisions introduced to the scheme and retains its position of no objection.' Not surprisingly their comment on this application says 'we are comfortable to reinstate our position of no objection.'" The consultant said "reinstate", heard on 22 September 2026; Historic England's letter of 9 July 2026 (document 9457100) says "reiterate". The passages read to members are the passages in which Historic England does not object; the passages in which it finds harm from the building's massing were not read. Source: webcast 0:39:37 to 0:40:10; document 9457100 with its appended comments; the Historic England FOI schedule, section 2.
2. Entry 4.37. The applicant's consultant gave the Victorian Society's finding as a matter of focus. The minutes, item 33: "It was acknowledged that Victorian Society had found some harm as they had concentrated on the 19th Century Bodley Library rather than the wider college. It was felt that they had not considered the wider heritage benefits. Clarification had been sought on some of their comments to which they replied that their committee did not consider this to be an overly contentious design, rather that small adaptations could be implemented to mitigate any outstanding harm." The webcast (0:40:14 to 0:40:46): "We acknowledge the Victorian Society finds some harm. … We sought clarification on some of their comments, and their email to us on 9th of July … They said that their committee did not consider this an overly contentious design. Rather, they felt that small adaptations could be implemented to mitigate any outstanding harm. We provided a note by Grafton Architects explaining how they responded." Reading note:

the year spoken after “9th of July” is “2027”; the Society’s email on the register is dated 9 July 2026 (document 9464487). The Society’s finding on the register is “a low to moderate level of less than substantial harm” (item 81), with a request that the Council “review our advice from August 2025” and “reconsider the minor alterations we previously proposed” (document 9455369). Source: webcast 0:40:14 to 0:40:46; documents 9455369 and 9464487.

3. Entry 4.38. The applicant’s consultant summed the consultees up as not objecting. The minutes, item 34: “The college had been consistent in that it did not identify harm to the setting of the Bodley and indeed had recognised many other heritage and public benefits from the proposal. Historic England did not object nor did the conservation officer.” The webcast (0:40:46 to 0:41:00): “Just in conclusion we have been consistent that we do not identify harm to the setting of the Bodley and indeed recognise many of the heritage and public benefits from this proposal. Historic England does not object nor does the conservation officer.” So members were given the outcome of each consultation and not the finding in it. Source: webcast 0:40:46 to 0:41:00.

4. Entry 4.4. The applicant’s consultant put the applicant’s own assessment as no harm at all. The minutes, item 29: “This special regard had to be assessed as the college had done and given great weight when considering proposals in the planning balance. When proposals did lead to less than substantial harm this needed to be weighed against the public benefits of the scheme by virtue of paragraph 215 of the Planning Policy Framework. There was no harm to be outweighed anyway quite the opposite but there were clear benefits.” The webcast (0:39:15 to 0:39:31): “We say there is no harm to be outweighed anyway, quite the opposite, but there are clear benefits.” So the one assessment before the Council that finds no harm is the applicant’s, and the application’s Heritage Statement itself identifies “the small or low level of heritage ‘harm’” (document 9423964, paragraph 6.6). Source: webcast 0:39:15 to 0:39:31; the harm register, section 1.

5. Entry 4.44. The Master told members that optimum viable use is not in the application. The minutes, item 37: “The objection to optimum viable use was note mentioned in the application. However, the college contended that the new library would be better that the old one as it would be accessible in a way that the old one was not. The CLAG website talked of phantom benefits. The college thought that by allowing its students with mobility issues and neurodiversity challenges to study was a plus.” The webcast (0:41:40 to 0:42:00): “The third ground for objection was optimum viable use. This is not mentioned in our application, but what we contend is that the new library will be better than the old one because the new library will be accessible in a way that the old one is not.” Source: webcast 0:41:40 to 0:42:00; the harm register, section 4.

6. Entry 4.32. The applicant’s consultant, answering a councillor, accepted that the conservation officer found harm and relied on the box. Not in the minutes. The webcast (1:33:35 to 1:33:51): “My understanding of the conservation officer’s comments, which we put online there: the first thing is he ticked the box which says no objection. So whilst he did identify some level of harm, I think when you look at the form which he submitted, it says no objection.” So the applicant’s own consultant states the finding and the box in one sentence, and asks members to take the box. Source: webcast 1:33:35 to 1:33:51; speaker confirmed by ear on 22 September 2026.

7. Entry 4.51. The chair told members, before the case officer spoke, that the consultation responses had been given to them whole. The minutes, item 72: “Copies of the consultation response from all of the relevant heritage consultees had been distributed to Members.” The webcast (1:10:45 to 1:11:00): the case officer had circulated to all members, the petitioners and the applicants “copies of the consultation responses in full

from the relevant heritage consultees". So the members held the findings themselves when the applicant's account was given. Source: webcast 1:10:45 to 1:11:00.

8. Entry 4.26. The case officer stated each consultee's finding to the same members. The minutes, item 79: "Historic England were comfortable to reiterate their position of no objection. However, their comments had been appended to the previous application where it was clearly stated that they had concerns regarding the scale and bulk of the building and would result in a certain level of harm to the significance of the Grade One listed Christ's College buildings." Item 80: "In terms of the internal Conservation Officer, they had concluded that on balance the harm to the setting of the Grade One listed building was considered to be less than substantial at the lower end of the scale in requiring paragraph 215 of the MPPF to be engaged. There were other heritage benefits considered but not sufficient to outweigh the heritage harm." Item 81: "The Victorian Society had stated that the proposal would result in a low to moderate level of less than substantial harm." The webcast (1:14:49 to 1:16:10), on Historic England: "their comments have been appended referring to the previous application, where they do quite clearly state that they have concerns regarding the scale and bulk of the building, and that they consider it would result in a certain level of harm to the significance of the Grade I listed Christ's College buildings"; on the conservation officer: "They do consider there are other heritage benefits, but not significant, sorry not sufficient to outweigh the heritage harm"; on the Gardens Trust: "given the historic and current use of Bath Court, the appearance of the proposal would not cause serious harm to the court's low value as part of the registered park and garden"; on the Victorian Society: "a low to moderate level of less substantial harm". Reading note: the words on the conservation officer are as heard on 22 September 2026; the minutes, item 80, give the corrected form. So the Council's own officer gave members the findings, with their degrees, that the applicant's account left out. Source: webcast 1:14:49 to 1:16:10; the harm register, sections 1 and 2.

9. Entry 4.27. The chair told members that the report would set out the differing assessments of harm. Not in the minutes. The webcast (1:46:07 to 1:47:43): "there are legislative protections which are set out in sections 66 and 72 … They effectively provide a safeguarding where special consideration has to be given to any harm to heritage assets, and the greater the harm, the greater the consideration needs to be given with that protection in mind. The public benefits have to be balanced against that harm. That is a requirement of the NPPF, and the officer report would set that out clearly. And you've heard this morning that different heritage experts have arrived at different assessments as to the level and extent of harm to the heritage assets that are in play here. But all of this will be set out quite clearly within the officer report when the application is reported to Planning Committee." Reading note: the words cut name the Acts. So the Council's chair undertook in public that the report would set out the level and extent of harm each assessment found. Source: webcast 1:46:07 to 1:47:43; the case officer letter, section 2.

10. Entry 4.18. The petitioners' planning consultant put on the record that the consultees' positions had moved. The minutes, item 47: "Informed opinion against the current scheme had hardened. Historic England had reiterated its view that the development would cause harm. The Victorian Society and the Councils own conservation officer had also hardened their positions and Cambridge, Past, Present & Future had now objected in strong terms." The webcast (0:49:35 to 0:49:59): "My third point is that informed opinion against the current scheme has hardened. Historic England have reiterated their view that the development would cause harm. The Victorian society and your own conservation officer have hardened their positions. And Cambridge past, present and future has now objected in strong terms." The applicant's letter of 1 August 2026 (document 9481026) answers: "we reject the comment at the forum that his stance has

‘hardened’. How can it?” The register records the change in each response (the harm register, section 3). Source: webcast 0:49:35 to 0:49:59; document 9481026.

11. Entry 4.31. The applicant’s consultant placed the concern about the Bodley’s setting in the view along the lane. The minutes, item 23: “The focus of concern about setting appeared to be in the view on Christs Lance from where the new library would appear taller that the Bodley. Historic England setting guidance and stated that the importance of setting lied in what it contributed to the significance to the setting of the heritage asset or to the ability to appreciate that significance.” The webcast (0:36:30 to 0:37:04): “The focus of concern about setting therefore appears to be in the view on Christ’s Lane, from where the new library will appear taller than the Bodley.” Source: webcast 0:36:30 to 0:37:04; the harm register, section 1.

The finding is made in CLAG’s harm register, sections 1 to 3, the conservation officer letter, section 2, and the case officer letter, section 2. The report must state, for each consultee, the harm found and its degree in the consultee’s words, and weigh the harm with the great weight HE6(1) and HE6(3) require. If it does, it starts from three findings of harm to a Grade I listed building’s significance or setting, and from the applicant’s own Heritage Statement, which finds harm too. If the report gives members “no objection” as the consultees’ position, it identifies no degree of harm under HE5(2)(c), carries less than the responses members already hold in full, and misleads members (Mansell at [42]).

3. The applicant reported to members that the Victorian Society’s “small adaptations” could mitigate any outstanding harm and made none, so the harm has not been minimised under the NPPF’s avoidance requirement, HE4(1)(b), and a report that finds it minimised is not based on accurate facts

The applicant’s consultant told members that the Victorian Society’s committee “felt that small adaptations could be implemented to mitigate any outstanding harm” (entry 4.37). The Society had asked the Council in July 2026 to reconsider “the minor alterations we previously proposed”, which “would do so without major impact on the College’s finances or the College’s stipulated capacity”. No drawing has changed: the Covering Statement records that “no changes have been made to the detail of the drawings” (document 9423967, paragraph 1.7). HE4(1)(b) of the NPPF requires harm to be avoided or, if that is not possible, minimised. If the report states that the Society’s alterations were proposed and none was made, the harm has not been minimised, and the finding under HE4(1)(b) follows. If the report finds the harm minimised, as the conservation officer’s comment of 26 August 2026 says of the facades and setbacks, it makes a finding of fact the register contradicts.

1. Entry 4.37 (section 2, item 2) records the applicant’s account to members: the Society’s committee “felt that small adaptations could be implemented to mitigate any outstanding harm”, and the applicant “provided a note by Grafton Architects explaining how they responded”. The minutes, item 33, record the account. Source: webcast 0:40:14 to 0:40:46.
2. The Society’s own words on the register. Its response of July 2026: “we urge the committee to reconsider the minor alterations we previously proposed. These changes, whilst few in number, could offer significant scope for improvement and would do so without major impact on the College’s finances or the College’s stipulated capacity.” Its reply to the applicant’s consultant of 9 July 2026: “Our principal point still stands. Harm is attributed to this scheme, and this has not been mitigated in the resubmitted design.” and “solutions to improve the design presented, which, by and large, remained unchanged by the time of submission”. So the alterations the applicant reported to members as

mitigation are alterations the Society says were not made. Source: documents 9455369 and 9464487.

3. The note the applicant provided is the architects' account of the design as it stands, titled "Response to Comments on the Grafton Architects Design for Christ's College Library by the Victorian Society". It records no alteration made in answer to the Society. Source: document 9458386.
4. Entry 4.25. A councillor asked what mitigation had been undertaken. Not in the minutes. The webcast (1:39:48 to 1:40:08): "it would also be useful to have some understanding of any mitigations undertaken in the light of comments from I think it's a Victorian Society and English Heritage". The chair: "We've made a note of all of those requests." No document on the register answers the request. Source: webcast 1:39:48 to 1:40:08.
5. Entry 3.4. The chair told a councillor that amendments were for the applicant. The minutes, item 88, record the question: "If no decision was to be made, what was the reason for holding this meeting." The chair's answer is not in the minutes. The webcast (1:26:00 to 1:27:12): "the purpose of the meeting was set out in my notes, but effectively it's to try and enable the engagement between petitioners and the applicants and possibly achieve amendments to the scheme that improve some of the, or maybe all of the, concerns that objectors raise. … We're not making any decisions today, but there will be dialogue between the case officer and the applicants after this meeting. The minutes of the meeting are posted, are being recorded, and then they will be attached to the officer report. It's entirely up to the applicants whether they want to engage with the process and make amendments, but it's an opportunity for the petitioners to make a case that amendments should be made and where." Reading note: the webcast page's transcript reads "enable GA engagement" for "enable the engagement". No amendment has followed, and the applicant has approached no petitioner so far as CLAG is aware. Source: webcast 1:25:29 to 1:27:14; the alternatives paper, 6.3.13.
6. The conservation officer's comment of 26 August 2026 says the design "has minimised adverse impacts through articulation of the facades and setbacks at the upper levels between the chimneys", and in the same comment that "the mitigations have not fully overcome the impact of the relative scale and proximity of the stair tower, and this part of the scheme remains harmful to the listed building's setting". So the Council's own officer finds harm that the design's measures have not overcome, and the measures the statutory amenity society proposed are not among them. Source: document 9505685.

The finding is made in CLAG's avoidance and justification letter, section 2, the Historic England FOI schedule, section 1, and the conservation officer letter. The report must list each alteration the Victorian Society proposed and state, for each, whether it was made and, if not, what the applicant's reason on the register is. If it does, the register shows none made and no reason given, and the harm has not been minimised under HE4(1)(b). If the report finds the harm minimised without that list, it makes a finding the Society's own reply and the Covering Statement contradict. That finding is not based on accurate facts (E v Secretary of State for the Home Department [2004] EWCA Civ 49 at [66]).

4. The applicant's reason to members for the building's bulk, "to avoid further digging", is contradicted by its own Planning Statement and by the Master's "That height can begin beneath the ground", so the bulk lacks the clear and convincing justification the NPPF's HE4(2) requires

The Master gave members one reason for the building's volume, mass and bulk: the College would not dig. The stacks rise from the ground "to aid ventilation and to avoid further digging into

the ground” (item 101), the consented design was abandoned because of its basement (item 15), and “there is no digging in the new building” (entry 4.6). The applicant’s own Planning Statement provides “excavation for the raised terrace and service runs” to a depth of 1 m, and its Design and Access Statement a piled raft foundation. The Master accepted, of the stacks, “That height can begin beneath the ground.” HE4(2) of the NPPF requires clear and convincing justification for harm to a designated heritage asset. If the report tests the reason against the register, the premise fails on the applicant’s own documents and the bulk stands unjustified. If the report repeats the reason, it adopts a statement of fact the register contradicts and misleads members (Mansell at [42]).

1. Entry 4.6. A councillor asked the parties to say which was right about digging, and the Master answered that there would be none. The minutes, item 93, record the councillor’s observation: “The existing library already had a partial basement.” The answer is not in the minutes. The webcast (1:41:01 to 1:41:22): “The new building will follow the existing line of Bath Court. So there will be no extra digging. There is a slight difference between the level of Bath Court and Christ’s Lane, which is why the petitioner says there’s a basement, but there is no digging in the new building.” Reading note: the transcriptions garbled “Bath Court”; the words were confirmed by ear. Source: webcast 1:40:27 to 1:41:22.
2. The register. The Planning Statement: “there are some external works including excavation for the raised terrace and service runs. The accompanying plans identify that the excavation works would be no deeper than 1 m.” The Design and Access Statement, part 3, section 10.3 (Structure): “The new library will be supported on a piled raft foundation.” So the application digs, and the statement to members was not accurate when made. Source: document 9423963, paragraph 7.117; document 9423962, section 10.3.
3. Entry 4.10 (entry 4.3 gives the same words). The Master gave the carbon reason for abandoning a basement. The minutes, item 15: “The key feature of the Mather design was a basement. On reconsidering the colleges needs, it was concluded that on advice this would be the least ‘Green’ thing that could be done for three main reasons: • Firstly the amount of embedded carbon. Typically, in a modern building 40% of embedded carbon was in the basement which the college wanted to avoid. The only way to ensure a basement was watertight was to use concrete which is one of the most carbon intensive building materials. • Secondly the site was very close to Grade 1 listed buildings. The Bodley dated from the 19th Century, but behind the student library was the 16th Century First Court which had no foundations. If a basement was dug within inches of this you would not know what you would find and were likely to have an unpleasant surprise. Heritage Harm was a the top of the colleges mind and they did not want to disturb the environment. • The third reason was the extra disruption. Many of the objections on the Planning Portal were about disruption, which was inevitable with a city centre site, with digging a basement would massively increase that as all of the material would need to be removed by lorry. In order to minimise any disruption it was decided not to include a basement which made the previous design no longer fit for purpose.” The webcast (0:29:06 to 0:29:45): “we concluded on advice that a basement would be about the least green thing we could do. So for three main reasons. One for the amount of embedded carbon. In a modern building, typically 40% of its embedded carbon is in the basement. We want to avoid that. The only way to make a basement watertight is by pouring concrete. Concrete is one of the most carbon intensive building materials. 9% of the world’s carbon emissions are because of concrete. So we don’t want to do it for green reasons.” The advice is on the register nowhere, and no figure on the register compares

the carbon of this design with the consented design or any other. Source: webcast 0:29:06 to 0:29:45; the sustainability evidence, section 2.

4. Entry 4.41. The Master gave the second and third reasons, the foundations of First Court and the disruption of removing soil. The minutes, item 15, as above. The webcast (0:29:45 to 0:31:01): “This building has no foundations. If you start digging a basement within inches of such a building, you do not know what you will find, you are likely to have an unpleasant surprise.”; “digging a basement would massively increase that because all the soil would have to be moved by lorry … from the site. So in order to minimise the disruption for the city and ourselves, we decided, no.”; “This meant that the Mather design was no longer fit for purpose.” So the consented design was set aside for reasons stated as the College’s choices, and no assessment on the register tests any of them. Source: webcast 0:29:45 to 0:31:01.

5. Entry 4.13. The Master, summing up, said why the stacks rise as they do and that they can start below the ground. The minutes, item 101: “The green credentials of the proposed building were substantial which was why the design included chimneys. The height of these was to aid ventilation and to avoid further digging into the ground. The heigh had also been cut back as much as possible.” The webcast (1:49:16 to 1:49:58): “the chimneys need to be a certain height in order to achieve that ventilating effect. That height can begin beneath the ground. But as I’ve said many times, we do not want to dig into the ground. So in order to get this green effect, the chimneys need to be the height they are. This was negotiated before the first application. They have been cut back as much as we can”. So on the applicant’s own account the stacks “can begin beneath the ground”, and the whole building can be lower. What keeps it where it is is the College’s wish not to dig, which its own application does not honour. Source: webcast 1:49:16 to 1:49:58; the sustainability evidence, section 1; the avoidance and justification letter, section 3.

6. Entries 4.14 and 4.15. The petitioners put the applicant’s own section to members. The minutes, item 61: “The current proposed structure did have a have a half basement which would require digging and would be half a storey below ground. The building would also be larger than those surrounding it.” Item 64: “The basement question was one of degree as it was half a basement.” The webcast (1:02:26 to 1:02:57; 1:05:38 to 1:05:46): “the current proposed structure does have half a basement”; “It is going to be half a story below ground”; “the basement question is one that is a question of degree. It’s not no basement or basement. It’s half a basement or more basement.” Source: webcast 1:02:26 to 1:02:57 and 1:05:38 to 1:05:46; the applicant’s section drawing, the alternatives paper, 5.2.4.

7. Entry 4.16. A second councillor found the answer at entry 4.6 “perplexing” and expected digging, and the chair undertook to give members the information. The minutes, item 99, record the question: “Would the new basement be at the same level as the existing building.” The chair’s answer is not in the minutes. The webcast (1:47:53 to 1:48:50): the councillor: “It might arrive at the same level but there would be digging. I would presume but if that could be clarified that would be good.”; the chair: “Officers can deal with that quite clearly as part of the officer presentation.” and “There are excerpts that the objectors have pointed to today showing cross sections of the scheme across Christ’s Lane into Bath Court. But we will make that information available to members.” Nothing on the register records the information given. Source: webcast 1:47:53 to 1:48:50.

8. Entry 4.30. A councillor asked which part of the building the 14 metres belongs to. The minutes, item 92: “The DCF could flag up any issues. However, clarity was needed on the height of the chimneys and detail of the wall and the public benefit needed to be defined.” The webcast (1:38:59 to 1:39:05): “So I’d like some clarity on the heights.

People keep talking about 14 metres. I'd need like to know if that was the chimneys or the whole structure." The figure spoken is 14 metres. The applicant's statements and drawings differ on the level of the stacks (the document accuracy letter). Source: webcast 1:38:48 to 1:39:11; the document accuracy letter.

The finding is made in CLAG's avoidance and justification letter, section 3, and the sustainability evidence, section 1. The report must state the reason on the register for the building's volume, mass and bulk, and test the digging premise against paragraph 7.117 of the Planning Statement and the structural statement. If it does, the premise fails and the bulk has no clear and convincing justification under HE4(2). If the report gives members "no digging" or "to avoid further digging" as the reason, it adopts a statement the applicant's own documents contradict, which is a mistake of established fact (E v Secretary of State for the Home Department at [66]) and misleads members (Mansell at [42]).

5. By the applicant's own test for a serious alternative, stated to members, the application assesses none, not the consented design, not the masterplan library, not the six competition entries, so the harm has not been shown to be unavoidable under the NPPF's avoidance requirement, HE4(1)(b)

The Master told members what a serious alternative must have: a back elevation, floor plans and the certainty that the College's needs fit inside (entry 4.33). By that test the application has assessed no alternative. The consented design of 2016 has all three and was set aside for its basement (entries 4.40 and 4.41); the College's masterplan library on the site is assessed nowhere; the six competition entries are on the register nowhere. HE4(1)(b) of the NPPF requires harm to be avoided where that is possible, which cannot be found without the alternatives assessed. If the report applies the applicant's own test to each alternative from the register, the harm has not been shown to be unavoidable. If the report accepts "not a serious alternative" without the test, it leaves the alternatives on the register out of account, a material consideration omitted.

1. Entry 4.33. The Master stated the test and applied it to the Create Streets design. The minutes, item 40: "The last contention was that the college and officers had failed to bring to the Councils attention significant other plans including the Mather design which had been dealt with significantly. The second was to create a streets schema which was a single page that showed one elevation onto Christs Lane. The only advantage of this to the colleges opponents was that it was shorter. It also had no back elevation, so that the relationship with the Grade One listed building was absent nor did it have any floorplans. Therefore, it was not at all certain that the college could achieve what it needed inside the building and was not a serious alternative. The Council were invited to look at it and reject it as a consequence." The webcast (0:43:37 to 0:44:14): "It is a single page. All it shows is one elevation onto Christ's Lane. The only advantage for our opponents is it is shorter. It has no back elevation. So the relationship with the Grade I listed building is absent. It has no floor plans. So it is not at all certain that we would be able to achieve what we need inside this building. It is not a serious alternative." So the applicant does not say its needs cannot be met in a lower building; it says that is "not at all certain", and it has tested the question nowhere. Source: webcast 0:43:37 to 0:44:14; the alternatives paper, 4.8.
2. Entries 4.1 and 4.2. The Master said alternatives on the College site were considered and rejected. The minutes, item 11: "Alternatives had been looked at on the current college site which had been rejected for both the historic reason of keeping things together on First Court and secondly, as the library connects Bodley which was a building

from the 1890's and was the old library and had not been in use since the current student library was built." The webcast (0:25:05 to 0:25:24): "We looked at alternatives on the college site and rejected them both for the historic reason of keeping things together on first court. And second because the library as you see connects to Bodley." The Planning Statement says the same of the masterplan: "Other sites were felt more peripheral and therefore discounted." So the choice of site is a preference stated as a reason, and no assessment of any other site is on the register. Source: webcast 0:25:05 to 0:25:24; document 9423963, paragraph 1.8.

3. Entry 4.39. The Master gave the reason for one site. The minutes, item 8: "In regard to the existing library, Christs College was the only college in Cambridge where all six of the central elements were around the first court which included the Porters, Chapel, Masters Lodge, hall, buttery and the library." The webcast (0:23:57 to 0:24:21): "Christ's is the only college in Cambridge where all six central elements of the college are around the first court: the porter's lodge, the chapel, the master's lodge, the hall, the buttery and the library. So that is part of our USP and always has been." A reason for the site is not a reason for the building's volume, mass and bulk on it. Source: webcast 0:23:57 to 0:24:21.

4. Entry 4.40. The Master said why the consented design was not built and why it was set aside. The minutes, item 13: "The College needed to replace the library and the need had been known for some time. A new library had been proposed 15 years ago when Rick Mather designed a replacement which received planning permission. However, funding was not available at the time." Item 14: "Since then, the building environment had changed with sustainability and accessibility concerns being a different place with things that people did not care about 15 years ago they do now." The webcast (0:28:22 to 0:28:45): "we had our first go at this 15 years ago when Rick Mather designed a replacement. We got planning permission for that replacement, but we did not have the funding so nothing happened." So the consented design, which has plans, elevations and the College's needs inside, was set aside for money and then for its basement, and neither is a reason the register tests. Source: webcast 0:28:22 to 0:28:45.

5. Entry 4.42. The Master said the design came from a competition. The minutes, item 16: "The college had organised an architectural competition with six entries. The winners Grafton Architects of Dublin, one of the world's leading architectural firms who had come up with a beautiful, sustainable accessible design." The webcast (0:31:01 to 0:31:13): "The college organised an architectural competition. There were six entries." The words are "six entries", as the minutes have them. Neither the brief nor any entry is on the register, so the constraint the winning design answered is unknown to the Council. Source: webcast 0:31:01 to 0:31:13; the avoidance and justification letter, section 2.

6. Entry 4.45. The Master said whom the building is for. The minutes, item 42: "The scheme was all about the students, it was not commercial and the college would not make money out of it. It was for the colleges 700 students over generations. It was hoped that the proposed building would last over 200 years so that many thousands of students would benefit from a beautiful, varied building." The webcast (0:45:03 to 0:45:17): "This scheme is all about the students. It is not commercial. We will not make money out of this. It is for our 700 students over generations." CLAG accepts the College's requirements in full; the question under HE4(1)(b) is the building, not the need. Source: webcast 0:45:03 to 0:45:17.

7. The masterplan library. The petitioners put on the record that the College's own masterplan of 2023 places a library on this site (the minutes, item 66) and asked that it be considered (item 105). The applicant's answer at the DCF is the notice at entry 4.9. The letter of 1 August 2026 says the masterplan's architects "suggested two possible

sites for the library: the existing site in Bath Court or on the Hobson Street carpark" and that the Governing Body "voted to rebuild on the existing site"; it does not say which statement about the masterplan was wrong, and no assessment of the other site is on the register. Source: the minutes, items 66 and 105; document 9481026; the alternatives paper, 4.4.

The finding is made in CLAG's avoidance and justification letter, section 2, and the alternatives paper, section 4. The report must apply the applicant's own test to the consented design, to the masterplan library and to the competition entries, from documents on the register, and state which of them the applicant's needs fit. If it does, at least one lower design passes, and the harm has not been shown to be unavoidable under HE4(1)(b). If the report accepts the applicant's "not a serious alternative" without the test, it omits the alternatives on the register, which is a material consideration left out (R (Friends of the Earth Ltd) v Secretary of State for Transport [2020] UKSC 52 at [116] to [121]).

6. The public access the applicant offered members in words results from any library on the site, not from this building's bulk, is in no application document and is secured by nothing, so under the NPPF's public benefits balance, HE6(4), it cannot be weighed against the harm this building causes

The Master told members "We will." when a councillor asked whether the College had considered public access to the library, and the applicant's letter of 5 August 2026 set the offer out. No drawing, statement, condition or obligation of the application contains any of it, and the application's own Planning Statement says the proposal "will not generate any additional visitors". HE6(4) of the NPPF weighs against the harm the public benefits resulting from the proposal, and an offer that any library on the site delivers, and that nothing secures, does not result from this building. If the report weighs only what the application contains and secures, the offer is not in the balance. If the report weighs the offer, it counts a benefit any lower library delivers equally and nothing secures, and misleads members.

1. Entry 4.29. A councillor asked "Have they considered making any public access to this library?", and the Master answered "We will. We are part of Cambridge City. We are proud to be part of Cambridge City. This is a facility which can be enjoyed by the city as well as our students." Those words are the whole of the offer made at the DCF, and the offer is in no drawing, statement, condition or obligation. From the petitioners' side, through the chair: "Is this a change from the last time? Because the existing library and last time's application did not permit access." The Master: "This is the first time I've been asked such a direct question and I'm giving a direct answer" (entry 4.7; 1:42:29). Then, from the floor: "I recollect the question was asked to the last DCF and or planning committee and the answer was that there was no access to the public except for the archival room. But I'm happy they changed their minds." The same question had been put and answered in September 2025 (item 6), so the Master's "first time" was wrong when said, and no one corrected it. The minutes, item 94, record the question only: "Has the College considered public access to the library." Source: webcast 1:41:47 to 1:43:04.
2. A councillor said "Great to see that in the application." It is not in the application. Source: webcast 1:42:10; not in the minutes; speaker confirmed by ear on 22 September 2026.
3. The chair said "Officers will follow up on that particular point." The follow up was the case officer's email of 4 August 2026, which is not on the register, and the applicant's letter of 5 August 2026 (document 9486713). The letter offers two 30 minute tours on three mornings a week out of term and school groups on two days, "initially", "for up to 15 people", with the detail to be developed "in light of experience". So the offer exists in

correspondence, with ceilings and no floor. Source: webcast 1:43:04; document 9486713.

4. Entry 4.24. In the summing up the Master said “a library is essentially a private space”, that the students have it in term and are there “for about 26” weeks, and “We will look at how we can share this new facility.” The minutes, item 102: “The library was a private space, although certain areas of the college were open to the public who could enjoy the Courts. The college would look at how it could share its facilities in the future.” So the access is for the half of the year the library is empty. Any library on the site, the consented lower design included, gives the same access in the same weeks. Source: webcast 1:50:01 to 1:51:05.
5. The letter’s tours “include the new library, the Bodley and the new Exhibition Room”. The Design and Access Statement says the Bodley “and linked Exhibition Space” are “reactivated as part of a separate contract already underway by others”. So nothing in the offer needs this building’s volume, mass or bulk. Source: document 9486713; document 9423960.
6. In September 2025 the same question was put, and the applicant’s answer offered access to the College and a café, none to the library. The application documents have not changed since; the words have. Source: the Council’s 2025 notes, items 38(iii) and 39; Covering Statement, document 9423967, paragraph 1.7.
7. The application as filed provides no public access: the Planning Statement says of the proposal, explaining its demands on parking and refuse, that “it will not generate any additional visitors”, calls Bath Court “the private amenity space”, and its own table of public benefits has no line for public access. So the offer is outside the application, and a benefit outside the application is not a benefit of the proposal. Source: document 9423963, paragraphs 7.40 and 7.48 and printed page 51.
8. Entry 4.46. A councillor asked for a section on how the public would use the library. The minutes, item 100: “Could the college be opened up in a more equitable way.” The webcast (1:44:19 to 1:44:36): “So I would really encourage like a section on how you would like the members of the public to use the new library, and hopefully to open up the college in a slightly more equitable way.” No such section is in the application. Source: webcast 1:44:19 to 1:44:36.
9. Entry 4.8. A councillor set the costs against the benefits then on the table. Not in the minutes. The webcast (1:45:16): “I can see some public costs. So I can see loss of light on Christ’s lane. We already heard about the vertical sky component being damaged. We also got a potentially economic cost and the general perception of the canyon effect. Against which I’ve heard a gate and a bench quoted and now possibly public access to the library.” So a member counted the offer as “possibly” a benefit on the day it was made, against costs already on the record. Source: webcast 1:45:09 to 1:46:06.
10. The offer was put before no consultee; the conservation officer’s comment of 26 August 2026 weighs heritage effects only. So no consultee’s balance includes it, and the report cannot present one as having weighed it. Source: document 9505685; the alternatives paper, 6.3.14.
11. The Council knows what such an offer is worth when secured: on the sister application it secured the gate and the bench by condition and gave them “limited positive weight”. Here nothing is proposed to secure anything. Source: the alternatives paper, 6.3.8.

The finding is made in CLAG’s alternatives paper, section 6, and in the case officer letter. The report must state whether the access offer results from this building rather than from any library on the site, and what secures it. If it answers both from the register, the offer carries no weight

against the harm to a Grade I listed building. If the report weighs it without those answers, it counts a benefit any lower library delivers equally and nothing secures, and misleads members (Mansell at [42]).

7. The bench, the gate and the light at night, stated to members as benefits, are “minor” and “possible” in the applicant’s documents, measured nowhere, delivered by any library on the site, so under the NPPF’s public benefits balance, HE6(4), none can be weighed against the harm this building causes

The ward councillor asked what options the applicant had considered for a more active frontage, and the Master answered with a wall of windows, a bench and a gate (entries 4.19 and 4.20). The applicant’s student presenter and the Master told members the windows would put light into the lane at night (entries 4.43 and 4.34). On the register the bench is “a minor improvement to the public realm” and “a possible gift to the city”, the gate gives “a sneak view” into a private court, and no measurement supports the light. HE6(4) weighs public benefits resulting from the proposal; a bench, a gate and lit windows come with any library on the site. If the report weighs them at the applicant’s own rating, secured by nothing, they add nothing against harm to a Grade I listed building. If the report weighs them as significant, it exceeds the applicant’s own case without reasons.

1. Entry 4.19. The ward councillor put the frontage question. The minutes, items 84, 86 and 87: “The current frontage of the college onto Christs Lane is extremely ugly looking like the back of an industrial estate. The proposed plans could be argued to be an improvement. However, they were taller.” “There was a desire for a more active frontage even more than that which had been proposed as at pedestrian level it was still just a wall and enquired what options had been considered in the context of the current scheme to improve the experience of the public real?” “Enquired what other options had been considered to improve the pubic realm.” The webcast (1:17:23 to 1:19:21): “I can see that there are some more windows, but at pedestrian level it is really still a wall. So my question really to the applicant is, what options did you consider for a more active frontage in the context of the current scheme to improve the experience of the public realm of people walking along the lane? What options did you consider and where did you feel not able to include in the application?” Source: webcast 1:17:23 to 1:19:21.
2. Entry 4.20. The Master answered with three things. Not in the minutes. The webcast (1:20:44 to 1:21:51): “First, that as you pointed out, Councillor, it is a blank ugly wall and the next one will be beautiful and varied with different windows, more light pouring into the lane. So it will be much more attractive. Second, there will be a bench for public use that runs along it. And third, at the hearing last year, the Committee was very interested in the gate. At the moment it is solid wood. Since then we have commissioned an artist who, inspired by the Cambridge Fragment, which is held by the College, the oldest wallpaper in England, has come up with a filigree iron gate design which will allow the public to see into Bath Court for the first time.” The words “Bath Court” and “more light pouring” were confirmed by ear. No option for a more active frontage was named. Source: webcast 1:20:44 to 1:21:51.
3. Entry 4.23. The applicant’s consultant described the design’s intent as defensive and placed the plan’s active frontage on the other side of the lane. Not in the minutes. The webcast (1:21:57 to 1:23:20): “Part of the character of Cambridge, as you know, about the interface between colleges and public streets is one of slight defensive nature of their designs. And so it is getting that balance between trying to respect the character of the buildings, but also trying to give a bit more animation back to the street, which we believe

the new façade will do.”; “So the animation as shown on the current local plan is just on the south side. That’s not to say you still might want to try and get more animation on the street, but that’s where the current policy is.” Source: webcast 1:21:57 to 1:23:20; the design and development plan paper, section 3.

4. The register on the bench and the gate. The Planning Statement: “there will be a minor improvement to the public realm through the incorporation of a bench along the frontage”; “the proposed bench and potential for interpretation material has the potential to be a proportionate and usable contribution to the public realm”; the new gate “will give a sneak view into the attractively-relandscaped Bath Court”. The Design and Access Statement: “A long stone bench stretching the length of this wall is considered as a possible gift to the city.” No condition or obligation secures either; on the sister application the Council secured both by condition and gave them “limited positive weight”. Source: document 9423963, paragraphs 5.21, 7.40 and 7.43; document 9423960; the alternatives paper, 6.1.2 and 6.3.8.

5. Entry 4.43. The applicant’s student presenter told members the windows would light the lane. The minutes, item 17, record the presentation. The webcast (0:34:23 to 0:34:44): “The project puts windows and people and light behind the wall for the first time. It gives views into the library, a bench and an arched gate by day, and at night light from the library windows falling gently into the lane.” Reading note: “an arched gate” is the webcast page’s reading; CLAG’s transcription reads “unarched”. Source: webcast 0:34:23 to 0:34:44.

6. Entry 4.34. The Master told members the building would increase the light in the lane. The minutes, item 38: “A lot had been made in regard to the massing of Christs Lane which the college disputed and that having quite high buildings with a narrow lane between them was a feature of the Cambridge vernacular. The lane would be cool and would not be narrower and light from the upper stories would increase the light in Christs Lane after construction.” Item 39: “The building was on the north side of Christs Lane and would not affect the light.” The webcast (0:42:53 to 0:43:10): “light from the upper storeys will increase the light in Christ’s Lane after construction. The building is on the north side of Christ’s Lane so will not affect the light.” No measurement on the register supports either statement. Source: webcast 0:42:53 to 0:43:10; the environmental health officer letter, section 3.

7. Entry 4.22. The petitioners’ presenter answered the light claim from the applicant’s own section and offered a technical note. Not in the minutes. The webcast (1:23:33 to 1:24:21): “the windows are at about 14 metres high. So the human scale, nothing will change. It’s still a wall. But as the master mentioned that light would pour into the lane from these windows 14 metres above, as a physicist I can say that that is not the geometry in which light works.”; “The pavement will not be illuminated by a 14 metre window and I’m happy for someone to provide a technical note. We can submit a technical note.” The note is Exhibit E3b to this record, CLAG’s technical note on the light in the lane at night, filed with this record under that undertaking. Source: webcast 1:23:33 to 1:24:21.

8. Entry 4.5. The ward councillor asked for officers’ light and shade analysis for the committee. The minutes, item 85: “In respect of the height, it sounded necessary that the light and shade analysis be presented to the Planning Committee as this had been challenged.” The webcast (1:18:10): “In respect of the height, I don’t expect to engage in the discussion today, but it sounds very necessary that the light and shade analysis from officers on that is presented to the Planning Committee, because I believe that is being challenged, and I do think it’s relevant, given that one side will be higher”. Reading note: the webcast page’s transcript reads “the light and shade analysis, an analysis from

officers on that". No analysis by officers exists. The only analysis on the register is the applicant's own Daylight and Sunlight Report, on which the design and development plan paper, section 4, makes the finding. At the 2025 DCF the applicant's agent undertook to check whether that assessment "covered the whole year", and no such check is on the register. Source: webcast 1:18:10; document 9423969; the Council's 2025 notes, item 41(i).

The finding is made in CLAG's alternatives paper, section 6, the environmental health officer letter, section 3, and the design and development plan paper, sections 3 and 4. Exhibit E3b to this record shows from the applicant's own section across the lane that light from windows set that high goes mostly to the building opposite, and little of it reaches the pavement. The report must state the weight it gives the bench, the gate and the light, the document that secures each, and the measurement that supports the light. If it does, each carries at most the "limited" weight the Council gave the same items when it secured them in 2025, and the light carries none. If the report weighs them as significant, or counts light no document measures, it exceeds the applicant's own rating of its benefits without reasons and misleads members (Mansell at [42]).

8. The nine requests members made, which the chair left to the case officer, are answered on the register by the applicant's own documents, which contradict its letters, or by nothing, so a report that answers them from the letters adopts correspondence the application contradicts

The Council's own process produced nine requests, recorded in the minutes under "Members' Questions and Comments" (items 88 to 100) and among the ward councillor's points (items 82 to 87). The chair closed the meeting with the case officer's contact with the applicant's agent "to follow up any further action that was necessary" (item 114(ii)). The applicant answered two of the requests at the DCF and the rest in its letters of 1 and 5 August 2026, which are correspondence and not documents of the application. The Council's Statement of Community Involvement gives the DCF's aim as "to seek to resolve concerns" (paragraph 4.22). If the report answers each request from the register, each answer is the applicant's own document against the applicant, or nothing. If the report answers them from the letters, it adopts statements the application contradicts and misleads members (Mansell at [42]); if it leaves them unanswered, members decide without what they asked for in public.

1. The light analysis (entry 4.5; item 85). The request and the register's answer are at section 7, item 8. The letter of 1 August 2026: "Comments about light levels in the lane are equally unfounded. The spurious ratio assessment misses out one key factor". Source: document 9481026.
2. The frontage (entries 4.19 and 4.20; items 86 and 87). The answer at the DCF and the register are at section 7, items 2 to 4. The letter of 1 August 2026 says the building "gives better animation to the street". Source: document 9481026.
3. The harm and its level (entry 4.47). The minutes, item 89: "What was the harm in Planning terms and at what level." The webcast (1:29:23 to 1:29:37): "So question is, what is the harm in a planning context? Harm has been talked about. Is it a deal breaker, or can it be okay with a level of harm?" The chair, at 1:32:43, before the applicant answered: "I appreciate that different people have different views in this meeting on the level of heritage harm." The applicant's answer (1:32:57 to 1:33:30) states no level. The letter of 1 August 2026: "Our position on heritage harm is clearly set out in our Heritage Assessment", and, whether harm is set off against benefits or weighed as a level, "is immaterial as long as this exercise is carried out thoroughly". The register: each consultee states a level, and the Council's own case officer stated each to the same

meeting (section 2, item 8). Source: webcast 1:29:23 to 1:29:37 and 1:32:43; speaker of the chair's sentence confirmed by ear on 22 September 2026; document 9481026; the harm register, sections 1 and 2.

4. The stacks, the wall and the benefit (entries 4.21 and 4.30; items 91 and 92). The minutes, item 91: "The public benefit needed to be refined" Item 92: "The DCF could flag up any issues. However, clarity was needed on the height of the chimneys and detail of the wall and the public benefit needed to be defined." The webcast (1:39:11 to 1:39:24): "Obviously it's a fairly blank wall at the moment, but that is something that could have public benefit."; "For me, I think public benefit could be defined more clearly." The answer at the DCF: item 101, "The green credentials of the proposed building were substantial which was why the design included chimneys. The height of these was to aid ventilation and to avoid further digging into the ground. The heigh had also been cut back as much as possible." The letter of 1 August 2026: the detailing "could be covered by condition if considered appropriate"; public benefits are "anything which delivers the economic, social and environmental objectives in Para 8 of the NPPF". The register: the controlling drawing and the statements differ on the level of the stacks (the document accuracy letter); the NPPF of 17 August 2026 says of its objectives that they "are not criteria against which every development proposal can or should be judged" (paragraph 18). Source: webcast 1:38:48 to 1:39:24; document 9481026.
5. The basement (entries 4.6 and 4.16; items 93 and 99). The answers at the DCF and the register are at section 4, items 1, 2 and 7. The letter of 1 August 2026 is silent. Source: section 4.
6. Public access (entry 4.29; items 94 and 100). The answer at the DCF, the letter of 5 August 2026 and the register are at section 6. Source: section 6.
7. Demolition (entry 4.12). The minutes, item 95: "What was the justification for demolition and could the existing building be revamped." The webcast (1:43:21 to 1:43:43): "I would like to see some data on whether it's more effective to reuse the existing structure or if you really do need to get rid of the existing structure and if there's any reuse of the existing materials for cladding or for decoration." The answer at the DCF: item 103, "The current library was out of commission and a replacement was needed as soon as possible and was having a negative impact on students." The letter of 1 August 2026: the sustainability credentials are "set out in the supporting documentation" and include "the 'circular economy' and reuse of materials from dismantled buildings". The register: no structural or refurbishment assessment; the carbon of demolition counted nowhere. Source: webcast 1:43:21 to 1:43:43; document 9481026; the sustainability evidence, section 2.
8. The canyon effect (entries 4.48 and 4.50). The minutes, item 97: "Would the proposals create a canyon effect." The webcast (1:30:23 to 1:30:36; 1:31:12): "On the canyon effect, a slide was put up. So is it a canyon effect? When I've looked into canyon effects, I'm not sure that it is. It's a microclimate phenomenon, et cetera. Is it that?"; "Is it a canyon effect? Yes or no." The Master (1:32:11): "We do not believe that there is a canyon effect." Item 38 records the applicant's presentation: "A lot had been made in regard to the massing of Christs Lane which the college disputed and that having quite high buildings with a narrow lane between them was a feature of the Cambridge vernacular. The lane would be cool and would not be narrower and light from the upper stories would increase the light in Christs Lane after construction." The letter of 1 August 2026: "these intimate streets are often the most charming". The register: the applicant's own section and the enclosure it draws (the alternatives paper, 7.2; the design and development plan paper, section 2, item 7). Source: webcast 1:30:04 to 1:31:15 and 1:32:11; document 9481026.

9. Ownership (entry 4.49). The minutes, item 98: “Is the land in the proposal in the ownership of the applicant.” The webcast (1:31:16 to 1:31:22), spoken as a presumption: “So in general, I presume the land on which the development is proposed is in the ownership of the applicant.” No one at the DCF answered it or corrected it; the letters do not mention it. The register: the application form carries Certificate B, with notice served on 5 June 2026 on another owner; at the 2025 DCF the applicant’s agent said that “Half of the lane was public highway even though the freeholders were the colleges”. Source: webcast 1:31:16 to 1:31:22, confirmed by ear on 22 September 2026; document 9423721; the Council’s 2025 notes, item 40(xii); the case officer letter.

10. Entry 4.9 and the letter of 1 August 2026. The Master gave notice of a written reply: “I will follow up in writing but when our opponents materially misrepresent our own master plan, I give you notice we will reply in writing. That was a total misrepresentation” (1:57:24 to 1:57:36; not in the minutes). The letter describes itself as making “some points, largely in response to questions raised by” the councillors it names; on the masterplan it quotes nothing said at the DCF and does not say which statement was wrong. Three passages on its first page are blacked out. Source: webcast 1:57:24 to 1:57:36; document 9481026.

11. Entry 4.17 and the letter’s premise. The Master told members that the judicial review (R (Christ’s Lane Action Group) v Cambridge City Council, Christ’s College Cambridge interested party, AC-2025-LON-004656, listed for hearing on Tuesday 20 October 2026) found four shortcomings that “can all be addressed in this second application”. The minutes, item 5: “The Court had identified the date of 20 October 2026 for the hearing which the college felt was to long a time. It was added that the college looked at the substance of the Judicial Review which did not touch on the merits of the project but looked at the procedures and found four shortcomings.” Item 6: “The College had looked at those shortcomings and thought that they could all be addressed in a second application so that should a second Planning Application be granted the Council could be confident that it met the standards of the JR.” The webcast (0:23:14 to 0:23:43): “It looks at the procedures and found four shortcomings. So we have looked at those four shortcomings and think they can all be addressed in this second application so that should the Planning Committee give us planning permission a second time, they can be confident that this will meet the standards of the judicial review.” The Covering Statement says the points “are capable of being addressed in the Planning Officer’s report” (paragraph 2.2), and no document of the application addresses any of them. Source: webcast 0:23:14 to 0:23:43; document 9423967; the case officer letter, opening section.

12. Entry 4.35 and the letter of 5 August 2026. The Master gave the reason for the second application. The minutes, item 7: “Time was of the essence for the College as students had already bee using a temporary library for one year.” Item 103: “The current library was out of commission and a replacement was needed as soon as possible and was having a negative impact on students.” The webcast (0:23:49 to 0:23:57; 1:51:27 to 1:51:53): “Time is of the essence. Our students have already been in a temporary library for one year.”; “So that is why we have emphasised haste, because each generation of students is here for just three years and this is already negatively impacting.” The letter of 5 August 2026 answers the case officer’s email of 4 August 2026, which is not on the register. Source: webcast 0:23:49 to 0:23:57 and 1:51:27 to 1:51:53; document 9486713; the alternatives paper, section 6.3; the case officer letter, section 7, item 6.

The finding is made in CLAG’s case officer letter, section 8. The report must answer each of the nine requests from the register and say, for each, whether the applicant’s letters answer it. If it does, each answer is the applicant’s own document against the applicant, or nothing, in the sections named above. If the report gives the letters as the answers, it adopts correspondence

the application contradicts and misleads members (Mansell at [42]). If it leaves the requests unanswered, the committee decides without information its own members asked for in public and the chair left to the case officer's follow up.

9. The Council gave members the consultee responses in full and undertook the follow up, so a report that gives members less than they already hold, or leaves a request unanswered, is measured against the Council's own words at the DCF

The Council's chair and case officer spoke on the public record at the DCF: the responses were given to members in full, the requests would be followed up, the minutes would be appended to the report, and the report would set out the assessments of harm. The Statement of Community Involvement gives the DCF's aim as "to seek to resolve concerns" (paragraph 4.22). If the report carries the words as the recording and the minutes have them and answers each request from the register, it meets the Council's own undertakings. If it gives members less than the responses they already hold, or leaves a request unanswered, it departs from what the Council told members in public, and CLAG's committee papers letter names the error.

1. Entry 3.1. The chair opened the DCF with its aims. Not in the minutes. The webcast (0:17:33 to 0:17:52): "This meeting is automatically recorded and will be available for public viewing for six months from the date of the meeting."; "The aims of the forum are to allow early discussion of the planning issues and to explore the scope for agreement and compromise between all sides." Source: webcast 0:17:33 to 0:17:52; the Statement of Community Involvement, paragraph 4.22.
2. Entry 4.51 (section 2, item 7). The chair said members had the consultation responses "in full". The minutes, item 72. Source: webcast 1:10:45 to 1:11:00.
3. Entry 4.28. The case officer told members that conditions of the 2025 permission had been discharged. Not in the minutes beyond item 76 ("The relevant planning history was outlined."). The webcast (1:13:21 to 1:13:52): "Just for clarification, there have also been a number of discharge of conditions applications approved relating to conditions under the full application from last year that is subject to the judicial review." The day before, the Senior Planning Lawyer had stated the Council's position that "no document approved in discharge of conditions under 25/02161/FUL is treated as approved for this application, each being consulted upon and determined afresh", adding "Officers agree." Source: webcast 1:13:21 to 1:13:52; document 9495878; the conditions paper.
4. Entry 3.2. The petitioners asked for the time before the hearing to be used to find an alternative. The minutes, item 71: "This was an opportunity for the Council, the College and the public. The application should be deferred and use the next twelve weeks to look at a consented design, constellation and an appropriately sized scheme and also bring all parties together in an engaged, respectful, transparent and collaborative process." The webcast (1:09:56 to 1:10:24): "We would ask that this decision be deferred until the 20th of October and the 12 weeks be used to work together to find an alternative." Source: webcast 1:09:56 to 1:10:24.
5. Entry 3.3. The chair closed the DCF with the Council's undertakings. The minutes, item 114: "The Chair noted the following: i. Notes of the Development Control Forum would be made available to relevant parties, published on the council's website and appended to the Planning Officer's report. ii. The Planning Case Officer should contact the Applicant/Agent after the meeting to discuss the outcome of the meeting and to follow up any further action that was necessary. iii. The Applicant would be encouraged to keep in direct contact with the Petitioners and to seek their views on any proposed amendments.

iv. The Council would follow its normal neighbour notification procedures on any amendments to the application. v. Application to be considered at a future Joint Development Management Committee. vi. Along with other individuals who may have made representations on the application, the Petitioners' Representatives would be informed of the date of the meeting at which the application is to be considered by Committee and of their public speaking rights. The Committee report would be publicly available five clear days before the Committee meeting." The webcast (1:56:49 to 1:57:05; 1:57:48 to 1:58:54): "the committee manager will draft up the notes of the meeting, and these will be published on the Development Control Forum meeting webpage, and they will also be appended to the planning officer's report."; "the planning case officer will contact the applicant's agent for a discussion on the outcome and to follow up any action that is necessary. The applicant will be encouraged to keep in direct contact with the petitioners and to seek their views on any proposed amendments."; "Presently the application is targeted for the second of September planning committee, but that won't be settled until the officer report is settled and we feel comfortable taking it to that committee. The committee report will be publicly available five clear days before the committee meeting." Source: webcast 1:56:49 to 1:58:54.

CLAG asks three things of the Council on this record. First, that this record be placed on the public register for 26/02109/FUL beside the minutes on Friday 25 September 2026, the day this filing reaches the Council, on the ground stated in the register line at the head of this record. Second, that the Council confirm that it will keep the webcast with the application's records beyond the six months the chair named, which run to the end of January 2027, because the minutes it will append to the report rest on it. Third, that the Council confirm that the officer's report will give the DCF statements as the recording and the minutes have them. CLAG asks for the two confirmations by Tuesday 29 September 2026, the date CLAG's case officer letter, filed with this record, sets for the Council's answers. The correction of the minutes is asked for in CLAG's minutes letter, filed with this record.

If the report does these things, its account of the DCF can be checked against the recording and the minutes, and each request members made is answered from the register in the sections above. If the report gives members less than the responses they hold in full, answers a request from the applicant's letters, or leaves one unanswered, it departs from the Council's own words at the DCF. CLAG's committee papers letter and case officer letter name the error.

Index of entries by number

Each entry's text is in the section named; a second section cites it by number.

1. 3.1: section 9. 3.2: section 9. 3.3: section 9. 3.4: section 3.
2. 4.1 and 4.2: section 5. 4.3: withdrawn, the words are at 4.10. 4.4: section 2. 4.5: section 7, cited in section 8. 4.6: section 4, cited in section 8. 4.7: section 6 (the exchange at item 1). 4.8: section 6. 4.9: section 8. 4.10: section 4.
3. 4.11: withdrawn. 4.12: section 8. 4.13: section 4. 4.14 and 4.15: section 4. 4.16: section 4, cited in section 8. 4.17: section 8. 4.18: section 2. 4.19: section 7, cited in section 8. 4.20: section 7, cited in section 8.
4. 4.21: section 8. 4.22: section 7. 4.23: section 7. 4.24: section 6. 4.25: section 3. 4.26: section 2. 4.27: section 2. 4.28: section 9. 4.29: section 6, cited in section 8. 4.30: section 4, cited in section 8.

5. 4.31: section 2. 4.32: section 2. 4.33: section 5. 4.34: section 7. 4.35: section 8. 4.36 to 4.38: section 2 (4.37 cited in section 3). 4.39 and 4.40: section 5. 4.41: section 4. 4.42: section 5.
6. 4.43: section 7. 4.44: section 2. 4.45: section 5. 4.46: section 6. 4.47 to 4.50: section 8. 4.51: section 2, cited in section 9.
7. The letter of 1 August 2026: section 8, items 1 to 4, 7, 8, 10 and 11. The letter of 5 August 2026: sections 6 and 8, item 12.