

Consultee	Applicant Response
Hertsmere Borough Council	<u>Principle of Development</u> We note that overall, the LPA has no objection in principle to the grant of planning permission for the quantum of development proposed. The comments refer to a 'draft allocation' within the Regulation 18 Local Plan and the requirements within this. Firstly, the HBC Regulation 18 Local Plan was consulted on between April - May 2026. Within this, the site is included as a candidate site under reference 'HPBA SA2 Canada Life Site, B556, Potters Bar'. The candidate sites are those which are being considered for allocation within the Regulation 19 Local Plan, which is yet to be published. The supporting text of HPBA SA2 refers to the comprehensive redevelopment of the site. The Applicant submitted representations to the Regulation 18 consultation on this point, specifically that a future site allocation should avoid being overly prescriptive on this point to ensure there is flexibility for a scheme to come forward which may include the retention of existing buildings where this assists in achieving other policy ambitions (e.g. embodied carbon) and does not prejudice the development on the wider site. The potential for retention of the existing buildings is explicitly acknowledged in the Housing and Economic Land Availability Assessment (2025). The assessment of the Canada Life Site (ref CFS-2025-063) states the following: <i>"Current leases run until 2026 on the office building and 2031 on the retail units. However, given the size of the site, and particularly if Maple House (the tall building) was to be retained, development could begin within 5 years. The</i>

office buildings are not fully occupied but the plans include the retention / conversion of Maple House and provision of office space and redeveloped retail units”.

The above only refers to Maple House, as opposed to Canada Life Place which also benefits from Prior Approval for the conversion to residential development. Nevertheless, it explicitly acknowledges the potential for the existing buildings to be retained and converted and the benefit this would have in terms of delivering units within the first 5 years of the Plan period.

There is no adopted policy position that requires comprehensive redevelopment of the site and the emerging Local Plan is at an early stage and therefore can only be afforded very limited weight, if any at all at this present time.

Impacts on Heritage Assessment

It is acknowledged that the LPA considers heritage is unlikely to constitute a reason for refusal given the low / very low level of harm. However, we disagree with the weight afforded to the provision of market housing where the Council cannot demonstrate a five-year housing land supply. A 0.98 year supply is demonstrable of a dire housing need. This should be afforded substantial weight, as opposed to significant.

Moreover, not proposing affordable housing and any design considerations do not dilute the weight that is afforded to the provision of housing generally in the overall planning balance.

Impacts on Character and Appearance

The planning application documents set out how the proposed development responds to the pre-application comments made by the Urban Designer and Design Review Panel feedback.

We disagree that the proposed development fails to comply with NPPF Policy DP3 for the reasons set out below in the response to the urban design officer comments.

Townscape Impacts

Firstly, the TVIA methodology, including study area and location of representative viewpoints, was agreed with Officers during pre-application engagement. The correspondence is included in **Appendix 1**.

Secondly, and as set out further below, the comments from the Landscape and Townscape consultant do not identify what harm is caused as a result of the proposed development.

Landscape, Trees and Ecology

Further clarification in response to the Arboricultural comments is included below.

Waste Storage Provision

The information requested is included within the submitted application. This is clarified below.

	<u>Conclusion</u> NPPF Policy S4 provides explicit support for the principle of development within settlements, stating this should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. The significant benefits of the proposed development are set out in the original Planning Statement, which significantly includes the redevelopment of an underused brownfield, town-centre site, to provide 293no residential units contributing towards meeting an identified dire unmet need in Hertsmere. The benefits associated with the development are wide ranging and should be afforded significant weight collectively and we maintain the view that there are no adverse effects that would substantially outweigh these.
Place Services Historic Buildings and Conservation Advice	We note that there is no objection from a Heritage perspective, with the response concluding that harm to the significance of The White Horse public house is low, and harm to The Lion public house significance is very low. We agree that NPPF Policy HE6 (4) is engaged and the low level of harm is to be weighed against any public benefits resulting from the proposal, as per Paragraph 3.24 of our Planning Statement addendum. The LPA acknowledge this in their response, albeit they have not undertaken a benefit assessment. The LPA acknowledged that the Council cannot demonstrate a five-year housing land supply and consider this to be a significant benefit (substantial weight should be given to this). The weight granted to the lack of a five-year housing supply cannot be diluted by other aspects of the scheme (namely no provision of affordable housing or design as stated by the LPA, these should be standalone matters in the planning weighting exercise and not the heritage assessment). The LPA also acknowledge that heritage is unlikely to present a reason for refusal given the low/very low level of harm.

	We maintain that the public benefits would significantly outweigh the low/very low level of harm to the designated heritage assets identified and would refer the Inspector to our original Planning Statement.
Urban Design Comments	<u>Site Layout</u> The comments make reference to comprehensive redevelopment being a key opportunity within the candidate site allocation. As above, there is no adopted policy position that requires comprehensive redevelopment of the site and the emerging Local Plan is at an early stage and therefore can only be afforded very limited weight, at most. <u>Delineation of public vs private amenity space, wayfinding and circulation</u> The proposed hierarchy of routes through the site directly reflects the DRP comments, i.e. proposing a direct active travel route along the western boundary, linking Mutton Lane and The Walk, and the north-south active travel route, with routes through the communal courtyards providing a semi-private route for residents. This is expressed at Paragraph 3.5 of the DRP comments. The landscaped space between Blocks A, B and Canada Life Place is intentionally designed as a calmer and more intimate environment than the Neighbourhood Square. However, there is no gate or formal restriction preventing pedestrian movement through this space. Pedestrian desire lines have been incorporated into the landscape design, with routes connecting the Neighbourhood Square through towards Mutton Lane. A small commercial unit is also proposed at the Mutton Lane end, suitable for café/food and beverage use, providing activity at the southern end of the route and supporting movement through the space. The intention is therefore to retain pedestrian permeability whilst giving the space a quieter residential character. This is detailed on Page 63 of the DAS.

The Neighbourhood Square is not intended to operate as a terminating space from which pedestrians must return to the High Street. It forms the principal public arrival space and connects directly into the east-west route through the site. The onward route is legible within the landscape arrangement and continues towards Mutton Lane and the north-south connection to The Walk. Although controlled servicing and turning movements are accommodated, these are intermittent and do not prevent pedestrian movement through the space.

Notwithstanding the retention of Canada Life Place, the proposals provide a significant improvement to the existing townscape condition through the creation of a high-quality landscaped public space addressing the High Street. Commercial frontages and associated spill-out space are provided on either side, introducing activity and overlooking. Given the relatively low scale of the listed public house opposite, its immediate outlook is primarily towards this new public realm and the heritage assessment confirms there will be a low level of harm to its significance. Servicing to Block B is managed and intermittent, with the route adjacent to the square principally required for access and turning rather than functioning as a continuously trafficked street. This is detailed on Page 68 of the DAS. Canada Life Place is also subject to a separate consent for façade and landscape improvements.

The central route is not intended to function as a conventional trafficked street. Vehicular access is restricted by bollards and is principally required for managed servicing and access only, so vehicle movements will be intermittent rather than continuous. The route should therefore be understood primarily as part of the pedestrian movement network, with occasional controlled vehicle access, rather than as an infrastructure-dominated street. We therefore disagree that the proposed development does not comply with NPPF Policy TR4.

The comments at paragraph 1.3.5 refer to the inclusion of a gate to the space enclosed by the proposed Block E and the retained car park. The application documents do not state that the gate is to be locked or access controlled, and rather the introduction is to mark that people are entering a semi-private area (and accord with the delineation

requested by the DRP). The Applicant is amenable to this being a low 1m fence with unlockable gate, with details to be provided by way of condition. There is no objection from Hertfordshire Constabulary on Secure by Design grounds.

The space between Block D and the retained car park, referenced at paragraph 1.3.6 of the comments, is not proposed as a public alleyway or through-route. Rather it is to provide secure access to residents of Block D only to cycle storage. It is not the main entrance for residents of Block D, which is instead provided from the High Street frontage. Page 70 of the DAS demonstrates how this has been considered from a Designing Out Crime perspective, including the inclusion of a secure access gate. And Page 61 of the DAS shows how there will be visibility between the car park and this space, and the space also benefits from overlooking from the upper-level accommodation within Block D, together with controlled access, lighting and ongoing management. As above, there is no objection from Hertfordshire Constabulary on Secure by Design grounds.

Support for Active Travel

It is notable that the in the pre-application response dated 12 March 2026 (included in Appendix 1 of the Planning Statement), the LPA commented that the route along the western boundary was an improvement and reduced conflict between pedestrians and vehicles. At this stage, the proposals included bin and bike stores at ground floor, plus parking along the route (as is now proposed).

In response to pre-application discussions, the Applicant did seek to discuss the potential for upgrades with surrounding landowners. However, this is outside the Applicant's control given the connection to The Walk is third party land (and not adopted highway) which prevents any upgrade works being proposed. Notwithstanding, the application does propose offsite highways works to The Walk itself and safeguards land along the site frontages for

wider highway improvements to come forward as part of the LCWIP. HCC Highways are supportive of these proposals.

The proposed development is a clear improvement compared to the existing connection between Mutton Lane, the Walk and the railway station. The proposals provide a clearly defined pedestrian and cycle route with upgraded surfacing, planting and landscape treatment, including the retained oak trees forming a gateway to the northern connection. Whilst the route is also used by residents' vehicles and for servicing, it is designed as a low-speed residential street environment with pedestrian and cycle movement prioritised, rather than as a vehicle-dominated service route. The shared use of the route therefore does not, in itself, prevent it from providing an improved and legible active travel connection to The Walk and the station. A movement and access diagram is included on Page 63 of the DAS.

Paragraph 1.3.9 of the comments note that there was an opportunity to set development back from High Street and Mutton Lane. This is proposed, with Blocks A and B set back by approximately 7m from the High Street carriageway, creating a generous pedestrian zone relative to much of the surrounding High Street and allowing for improved footway width and commercial spill-out where appropriate. This is shown on the extent of future s278 works drawing included in Appendix 2 of the Planning Statement.

As set out in the Planning Statement, and as agreed with HCC Highways during the pre-application discussions, the overall approach is for land along the frontage to be safeguarded to enable future works set out in the LCWIP to come forward as part of a comprehensive highways improvement scheme, rather than taking a piecemeal approach to the delivery of improvements. The proposals do not prejudice the ability for future highway works including the creation of a segregated cycle lane, works to the bus stops, or additional crossing points. HCC Highways have confirmed in their application response that they are supportive of the additional width created on the site frontage.

Block D provides active commercial frontage to the High Street and therefore establishes a built form and ground-floor condition capable of supporting future public realm improvements. Again, the space created to the front of Block D that will be subject to a future s278 agreement is shown on the plan at Appendix 2 of the Planning Statement.

The proposed vehicular access strategy makes use of established access points rather than introducing additional points of conflict with pedestrian movement. The wider pedestrian network around the site includes existing signalised crossing facilities serving the High Street/Mutton Lane junction and surrounding routes.

Form & Scale

The location of the tallest element has been carefully tested through the design development process. Block A broadly retains the established position of the existing tallest building on the site, Maple House, rather than introducing height at a wholly new location. As part of the pre-application discussions, earlier options tested locating the tallest element closer to the High Street/Mutton Lane junction, but this was discounted in part because of the resulting daylight impact to both the remainder of the site and residential properties opposite. The proposed scheme therefore retains the tallest element on the Maple House footprint while introducing a stepped transition in height across the site. A commercial unit is provided at the base of Block A, with associated activity and spill-out space adjacent to the entrance into the landscaped space to the east. The role of Block A is as a wider townscape marker associated with the High Street and regeneration site, rather than solely as a marker to an individual pedestrian entrance.

Block A provides a landmark role in middle and longer distance views, assisting with wayfinding to the location of the High Street, as opposed to and differentiated from, the other taller buildings in this settlement clustered around

the station further to the west. In more local views, this element also assists in orientation to both the new public route running south-north from Mutton Lane at the base of the town and connection to The Walk.

Block E does not represent a separate architectural language from Blocks B and D. It forms part of the family of lower-rise linear perimeter buildings and adopts the same red-brick material palette and common architectural vocabulary. Its more domestic expression responds to its specific location and residential character rather than representing an unrelated architectural approach.

Block A adopts a deliberately integrated architectural crown rather than an applied roof feature. Its faceted plan form creates a more slender profile in oblique views, while projecting brickwork and increased articulation at the upper levels differentiate the crown from the principal façade. The approach maintains the architectural language of the building and avoids introducing a separate roof form unrelated to the overall composition. The legibility of this treatment should be considered through the submitted verified townscape views as well as the close-range elevation drawings. The pre-application response included in Appendix 1 of the Planning Statement suggested brick detailing and/or parapet design may help provide visual interest at the top. Brick detailing has been incorporated as shown on Page 55 of the DAS.

There is a request for views from public spaces within residential development 24/1101/OUTEI, which is subject to Secretary of State call-in. However, the scheme was in the application stage when viewpoints were agreed, one can only assume it wasn't included as this is private land and as such it would not be appropriate to have a viewpoint from the site however, representative viewpoints 10 and 12 from existing PROW to the south of the settlement do help to demonstrate likely visual effects from this direction. It is worth noting that this is located to the south of the site beyond the existing residential development that is situated on either side of the railway line. The requirement for viewpoints from this location is not therefore reasoned.

Appearance & Materiality

There appears to be a factual error in the consultation response, as there is no proposed Block C within the application. Block A uses a light buff-brick palette, while Blocks B, D and E use predominantly red brick. This is a deliberate hierarchy: the perimeter buildings respond more directly to the predominantly red-brick character of the local High Street context, while the taller Block A is differentiated as a marker building. Brick remains the common material language across the scheme as detailed on Page 52 of the DAS.

The distinction between Block A and the perimeter buildings is deliberate and reflects their different townscape roles. Brick remains the common material language across the development, while the lighter buff tone and stronger vertical expression of Block A identify it as the principal marker building. Blocks B, D and E adopt the red-brick palette and finer grain associated with the immediate High Street and residential context. Material samples and detailed brickwork panels can appropriately be secured by condition.

This comment appears to refer to Block D rather than Block B. Block D is the building that replaces and continues the existing High Street parade and incorporates the roofline response described.

Blocks B and D have deliberately been designed as part of the same architectural family. Common detailing is carried between the buildings, including the parapet treatment, brick articulation and corbelled brickwork, so that Block B reads as a continuation of the wider perimeter-block language rather than as an isolated element. The distinction in scale reflects its different role within the overall composition. This is detailed on Pages 56 and 57 of the DAS.

The proposed pergola and climbing-plant strategy is not intended to conceal the car park completely. Its purpose is to soften its appearance, introduce a secondary landscape structure and improve views of the upper deck from

surrounding buildings. The Landscape Strategy deliberately retains a relatively open structure over the top deck to avoid excessive wind loading, while providing more substantial vertical greening to the elevations. Plant establishment, replacement and maintenance can be addressed through the landscape management plan. Details of this are included on Page 36 of the Landscape Strategy.

Internal amenity, privacy and outlook

Setting back Block D further than it is proposed would have compromised the landscaping space provided between Blocks D and E. As above, the proposed development does not preclude future works as part of the LCWIP coming forward.

As above, the proposed pergola and climbing-plant strategy is not intended to conceal the car park completely. Its purpose is to soften its overall appearance. Details on the relationship between Block D and the retained car park are included on page 61 of the DAS.

Block B is set back circa 7m from the carriageway.

The conversion of the residential units in the retained Canada Life building have been approved under a separate application (ref 25/1764/PD56M).

It is acknowledged that double beds were incorrectly shown in the studio units in Block A as a result of a drawing issue. This has been revised and updated drawings are provided. These units comply with the Nationally Described Space Standards as 1b1p units.

Landscape and external amenity

The area of publicly accessible open space quantified on Page 34 of the Landscape Strategy, also includes the area of street frontage that contributes to the High Street extension space between Blocks B and D. Page 15 of the Landscape Strategy shows how this will function as a cohesive space for the public to use.

Servicing

Servicing to Block B is managed and intermittent, with the route adjacent to the square principally required for access and turning rather than functioning as a continuously trafficked street. Canada Life Place is also subject to a separate consent for façade and landscape improvements.

Energy and Sustainability

There is no policy requirement to include car club spaces, albeit the proposed development proposes a car-club bay in order to further promote sustainable travel options.

The application does not prejudice off-site cycling networks being improved as part of the wider LCWIP proposals and it was agreed with HCC Highways, that rather than take a piecemeal approach to this, the preference would be for the LCWIP Highways works to be undertaken more comprehensively.

There is no policy requirement requiring the provision of PV panels.

The noise levels achieved within some of the rooms facing High Street is typical of sites within town centre locations and this has been appropriately modelled in the Overheating Assessment submitted with the application.

Place Services - Landscape	<u>Layout</u> There is a comment that the built form that wraps around the SE corner of the site necessitates the removal of the existing site trees on Mutton Lane. We note that the LPA clarify in their response: <i>"At pre-application stage, the loss of the nature trees located to the south-eastern corner of the site near the junction of Mutton Lane and High Street was discussed. It was agreed that a balance was required between the need for tree retention and the appropriate location of built form and open space. It was agreed that this corner of the site was not an appropriate location for public open space given its noisy environment, and therefore built form was proposed to front this location."</i> The removal of the existing basement below Maple House also necessitates the removal of trees in this part of the site. As above, the proposals do not prejudice wider highways improvement works coming forward as part of the LCWIP and this can include street trees where appropriate. <u>Visual</u> The response solely references 'wirelines', but a select number of photomontages have also been provided as part of the verified visualisations to support the TVIA, along with other CGIs within the DAS.
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Also, the response references LCA24: Catherine Bourne Valley, but the Hertsmere Outline Landscape Appraisals Report (2020) refers to either the LCA24: Arkley Plain or LCA27: Catherine Bourne Valley.

It is firstly relevant to note that the TVIA methodology, including study area and location of representative viewpoints, was agreed with Officers during pre-application engagement.

As part of this, a ZTV exercise was undertaken to test potential visibility from open land to the west/north-west of the settlements, as informed by site survey work. This indicated a relatively limited area for views to be gained of the proposed development from within that sector of the study area previously agreed with the LPA. Viewpoint 11 from PROW within this area has also been selected and then verified and visualised for the application submission scheme, which is considered to be representative of change effecting those relevant landscape / visual receptors to the west and northwest of the town. This approach and scope for the TVIA was again agreed with the LPA as part of pre-application engagement.

Should the taller building be seen on the far skyline within the town centre from this area, this would be seen in the context of an existing tall building on site that would be replaced in a similar location and which has already an established visual effect.

Landscape and Visual Effects

The response suggests that the magnitude of change on receptors using the rural landscape and open parkland has been underestimated. The response does not however identify what harm this results in.

	All development will result in a change on visual receptors. The key consideration is to whether this change is harmful or not. The comments result alludes to harm being caused as a result of the proposed development, but no alternative assessment or robust evidence has been provided to demonstrate how the scheme does result in the harm cited. The TVIA submitted sets out the Appellant's position which we maintain.
Parking Operations	The comments are noted.
Places Services – Arboricultural	The comments suggest insufficient justification has been provided for the proposed level of tree removal. As explained in the application documentation, this is largely due to the removal of the existing basement of Maple House. Retention of the trees would have also conflicted with the policy requirements to make the best use of land (NPPF L2) and provide a high-quality landscaping scheme (Policy DP3). There are operational constraints during construction to consider, and several trees are located close to the proposed buildings and would be subject to considerable construction pressure. The comments make specific reference to trees T15-T26. It is acknowledged that these trees are located more centrally within the courtyard and are therefore potentially less affected by the construction works, but their retention would conflict with the proposed attenuation and landscape amenity strategy. The design intent is to mound the centre of the courtyard, visually lifting the landscape between the Tower (Block A), Block B and CLP. This also allows each residential entrance to have a gently defined entrance garden court,

	connected by routes around and across the mound, which itself forms a central meeting space with prospect, inviting residents to dwell. The urban design comments highlight that the mounded elements incorporated create a more dynamic landscape and are positive elements of the scheme. The southern courtyard, where T15-T26 are located, would also be significantly shadier than the existing condition, so there were concerns about the long-term suitability of trees already put under stress during the works. The overall approach was therefore to establish a landscape that makes a pleasant space integrated into the new built form and to introduce new trees in appropriate locations and species that are well suited to the shadier conditions. The proposals include a comprehensive landscaping including a net increase of 34no trees compared to existing. The comments also request the provision of the Tree Root Radar Investigation in full specifically in relation to trees T90 and T91. As set out in the Planning Statement (Paragraph 5.126), the AIA submitted with the application includes an assessment of plant buildings located adjacent to the retained car park, however no buildings are proposed here as part of the submitted scheme albeit there may be a requirement for future external plant in the form of a sprinkler tank. The plans show a hatched area within which future plant may be located and if considered necessary, the Applicant would be amenable to a condition requiring the full Tree Root Radar Survey to be provided along with detail of any future plant to ensure that the LPA can make a full assessment of the potential impact on those trees.
Ecology	The comments are noted.

Waste Management Services	Details of the split between refuse and recycling bins is included in Table 3.4 of the Management Plan and within the Schedule of Accommodation. An updated version of the SoA is enclosed to remove the previous reference to 'waste compaction' which is not proposed as part of the scheme. Vehicle stop points are detailed within Paragraphs 4.6 – 4.9 of the Transport Assessment and on Page 68 of the DAS. Walking distances to each storage area are shown on the marked-up floor plan extracts on Pages 7-8 of the Refuse Management Plan. The Refuse Management Plan has been drafted in accordance with the Hertsmere 'Waste Storage Provision Requirements for New Residential Developments' document which we understand is the latest guidance (and what the LPA has submitted as a supporting document as part of the application).
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	This specifies the following and explicitly includes for paper recycling: Collection Service Overview Hertsmere Borough Council currently operates a fortnightly refuse and recycling service to dwellings included in this section. Each property within this section requires the following containers for waste and recycling: ■ 240L wheelie bin for general waste ■ 240L wheelie bin for food and garden waste ■ 240L wheelie bin for commingled recycling (excluding paper) ■ 38L box for paper recycling ■ 55L for future waste storage provision** Notwithstanding, we would be amenable to a condition requiring a detail waste management plan to be submitted for approval.
Environmental Health	We have no overall objection to the conditions requested by Environmental Health but do note that an Overheating Assessment has already been submitted as part of the planning application. There appears to be no criticism of this submitted report, therefore a condition requiring compliance rather than new information is more appropriate.
HCC Growth	The response makes no acknowledgement of HBC having an adopted CIL charging schedule in place. We maintain our position that CIL is an appropriate route for HCC to secure monies towards strategic infrastructure, as set out in Section 6 of the Planning Statement.

	Notwithstanding this, in the event the Inspector disagrees with the position, the legal obligation includes the requested contributions towards Secondary Education, SEND, Waste (Transfer Station) and Waste (Recycling Centre) as blue pencil clauses.
Herts Constabulary	We note that the Herts Constabulary does not raise any objection to the proposed development. The Applicant would be happy to accept a Secured by Design condition.
Hertfordshire County Council Highways	<u>Planning Obligations</u> The comments explicitly state that HCC seek immediate and specific impacts of larger developments to be mitigated via S278 obligation or funded via CIL/s106 agreement in the conventional way to facilitate delivery and enhancement of the necessary active and sustainable transport. Clearly this suggests CIL is an appropriate mechanism for planning obligations relating to Highways to be secured, yet the response does not acknowledge further that HBC have CIL in place. The response refers to a contribution of £9,861 per dwelling. As per our Planning Statement, this is a blanket contribution which does not reflect the nuanced position in Hertfordshire where some Council's have CIL in place and others do not. It also far exceeds the cost per unit for all s106 contributions as assumed in the HBC Whole-Borough Viability Assessment (6.24-6.25) (included in Appendix 2). It is also relevant that the original consultation response from HCC included the following passage: <i>"The applicant lists various measures in Paragraph 4.44 which sets out further support that will be included</i>

*to support the LCWIP's objectives by delivering clear, effective connections that promote active and sustainable travel choices for both future residents and the wider community. All of which can be theoretically subtracted from the total £2.73m figure, clarification of the process has been provided by the applicant which I have included as **Appendix 1.**"*

Appendix 1 was not provided and HCC Highways have since revised and submitted an updated version of their comments, which now reads as follows:

"As described in HCC's Guide to Developer Contributions, the active travel funding gap figure is considered to be the total cost/value. Various Strand 1 measures are listed in Paragraph 4.15 however these have not been costed and would potentially be removed when the LCWIP improvements for The Walk are delivered. So, we have not included these as Strand 1 contributions."

HCC Highways revised position takes no account of the offsite works that will be delivered as part of the scheme even though it is clear from the original response that the standard approach is for these to be deducted.

The updated response suggests that the offsite works may potentially be removed when the LCWIP improvements for The Walk are delivered. However, this is unlikely to be in the short term given the LCWIP identifies the improvements to The Walk (Route Potters Bar 9) as the 43rd priority scheme out of 65 routes in total (LCWIP included in **Appendix 3**).

We therefore maintain our position that CIL is the appropriate mechanism for funding of Highways infrastructure.

	The Strand 1 contributions of £14,650 for sustainable travel vouchers, and £6,000 for residential travel plan, are included in the legal obligation.
National Highways	The comments are noted.
NHS	The NHS has requested a financial contribution of £513,043, which equates to £1,751 per dwelling. The responses suggest that the s106 monies will be focused on additional primary care facilities in Potters Bar either to expand, reconfigure or relocate one or more Potters Bar practices and/or provision serving the development. We do not consider that the request meets the Regulation 122 tests. It is not considered that the contribution is directly related to the development itself, rather the need to improve services in general in the area. Insufficient evidence has also been provided as to the current plans for the primary care facilities in Potters Bar, including whether a costed scheme for improvements to services exists and the timescales for this to be carried out. We note that HBC considered a similar request from the NHS in relation to application 24/0451/FUL did not meet the relevant CIL 122 tests (paragraph 7.15.4 of Committee Report included in Appendix 4). Notwithstanding the above, we also maintain our position that healthcare should be funded by CIL.
Active Travel England	The comments are noted.
Save Canada Life Estate	We note that the majority of the comments concern the works to the existing Canada Life Place consented under planning permission 26/0764/FUL and fall outside the scope of this application.

	In respect of the comments relating to application S62A/2026/0159, the application is supported by an Overheating Assessment which considers how overheating risks will be minimised in accordance with national policy.
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Moreover, Part O of the Building Regulations applies to all projects commencing construction after 15th June 2023. The aim of requirement O1 is to protect the health and welfare of occupants of the building by reducing the occurrence of high indoor temperatures. This is met through designing and constructing the building to achieve both of the following:

- a. Limiting unwanted solar gains in summer.
- b. Providing an adequate means of removing excess heat from the indoor environment.

The scheme will need to demonstrate compliance with CIBSE TM59 methodology for predicting overheating.