



Hertsmere
Borough Council

Civic Offices
Elstree Way, Borehamwood
Herts WD6 1WA
Tel: 020 8207 2277
www.hertsmere.gov.uk

Planning and Economic Development

Section 62A Applications Team
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Ref: S62A/2026/0159
Contact: [REDACTED]
Extension: 020 8207 2277 Ext 5675
Email: [REDACTED]
Date: 08 October 2026

Dear [REDACTED]

Town and Country Planning Act 1990 (Section 62A Applications)

Application Number: S62A/2026/0159

Location of Works: Maple House, Nos 8-16 (even) & 30-32 High Street and nos 1-7 Princes Parade, EN6 5BA

Description: Partial demolition of existing buildings (with retention of existing two-storey car park and substation) and redevelopment of the site to provide a mixed-use development comprising residential apartments (class C3) and flexible commercial floorspace (class E) across 4 blocks and associated internal roads, parking, drainage, landscaping, amenity space and associated works.

This letter contains the Council's response to the applicant's 'Response to Consultation Comments' letter, dated 30 September 2026. Thank you for allowing us the opportunity to comment.

I refer to the applicant's document titled 'Consultee response table', which was appended with their above letter. I seek to address the applicant response to the comments of Hertsmere Borough Council, including the role of the heritage assessment in the planning balance; the comments of our Principal Urban Design Officer; and the applicant's view on whether various requested planning obligations meet the CIL tests.

Principle of Development

The applicant refers to the status of the Council's emerging local plan and the weight that can be afforded to it. I can advise that at the Full Council meeting of 7th October

2026, the Council voted to publish the Regulation 19 Local Plan for a 6-week period of consultation starting from 8th October 2026, and to submit that plan and its key supporting documents, on the basis that it is legally sound and legally compliant, to the Planning Inspectorate on or before 31st December 2026.

Whilst the Council would not suggest that the plan is at an 'advanced stage' for the purposes of NPPF policy DM4, the plan has progressed since the submission of this S62A application. Therefore, the Council would suggest that the plan is capable of carrying more than very limited weight as a material consideration. An extract of the site's draft allocation is provided at Appendix A of this letter. It is worth drawing attention to the emphasis on a comprehensively delivered development, with the extant consent fully integrated into the rest of the site. Furthermore, the requirement for the development to be design-led with new and improved public realm and open space, and with at least 20% affordable housing in line with emerging policy HE3. Development of the site is expected to enable transformative public realm enhancements, with the opportunity to support the comprehensive regeneration of Potter Bar High Street District Centre.

Weight afforded to the provision of housing

It is for the decision maker to decide what weight is to be afforded to the harms and benefits of the scheme. Even if the inspector is minded to agree with the applicant that the provision of market homes should carry substantial weight, the Council's view is that the harms to the character and appearance of the area, including the wider townscape, also carries substantial weight.

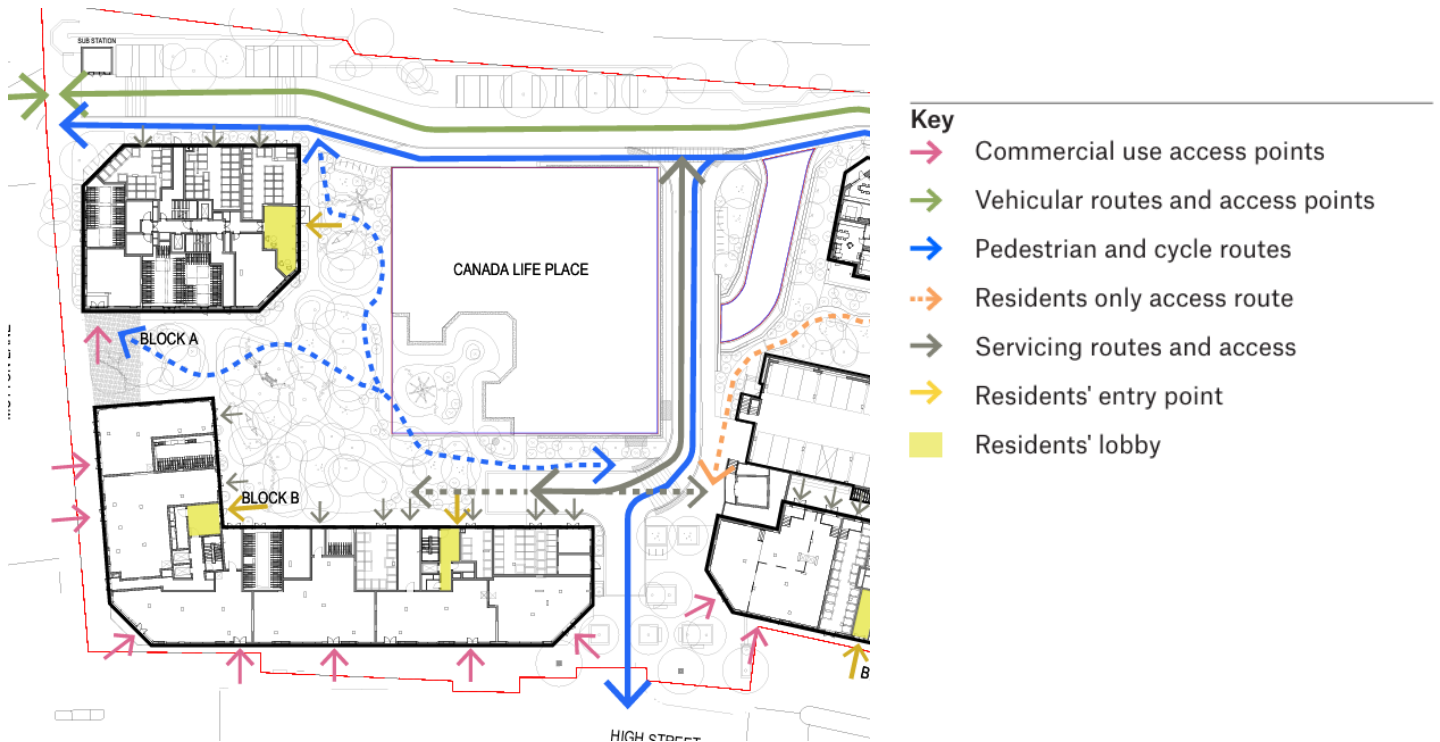
Urban Design Comments

Brief comments are made below in response to the applicant's rebuttal.

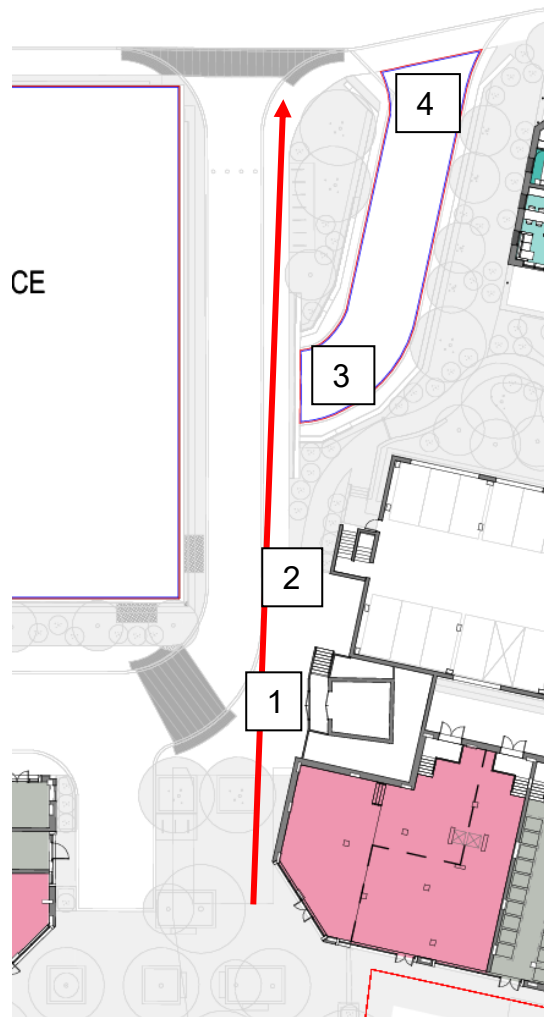
The applicant suggests that the Design Review Panel supported the provision of a spine road along the western boundary of the site, with reference to paragraph 3.5 of the DRP report. The Council suggests that this is taken out of context. The panel suggested that any route along the western boundary should be high quality, not car dominated, and should reduce conflict between pedestrians and vehicles. The Urban Design Officer's comments are that whilst the principle of the spine road in this location is acceptable, the quality of the route fails to achieve this.

With regards to the landscaped space between blocks A, B, and Canada Life Place, the applicant suggests that this will be only semi-private because it will not be gated to prevent public access. However, if public access is permitted across this space for permeability through to/from Mutton Lane, it is unclear how this will be communicated to the public in the absence of intentional design to draw footfall in this direction. It is unclear from the Movement and Access diagram in the Design and

Access Statement whether this space is for public or private access as there is no dashed blue line provided within the associated key:



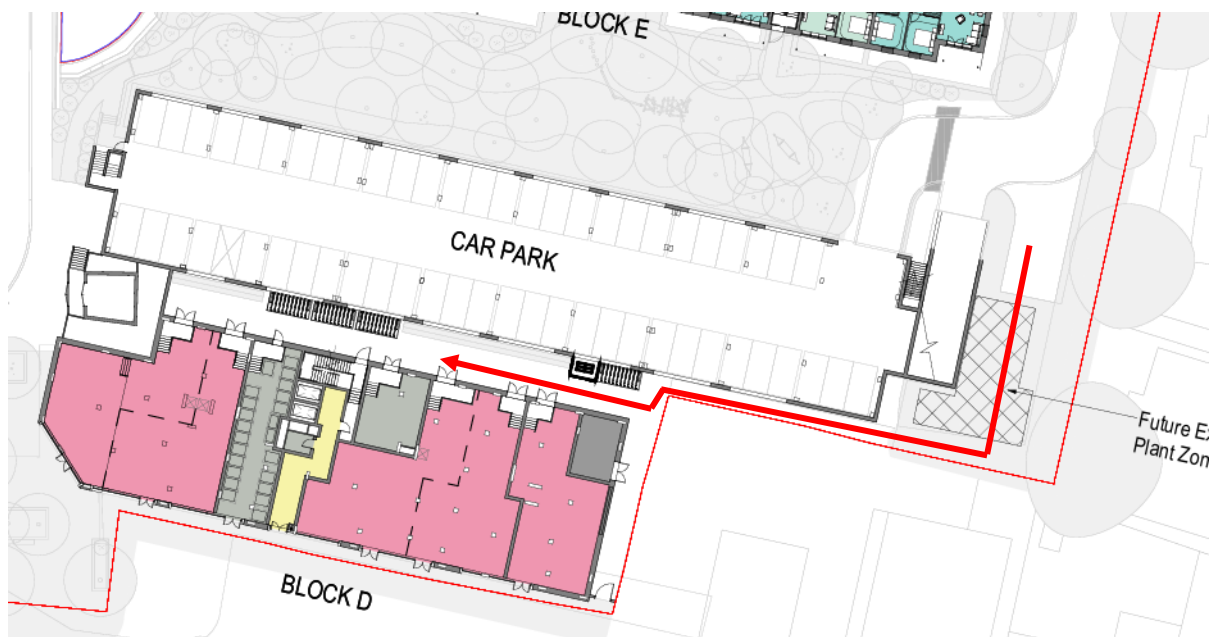
The Council maintains its view that the public square off High Street is a terminating space and that onwards pedestrian movement is not actively encouraged. The east-west service road, whilst only temporarily used for service and maintenance access, is nonetheless set out as a road with pedestrians segregated to the northern side of the route where the road is most infrastructure-dominated. By this, the Council refers to the route being lined by the retained sub-station, the side elevation of the retained car park, and the retained access ramp and its associated hard boundaries such as fall protection (1, 2, and 3 respectively below). Onwards travel to the north also then requires crossing the ramp entrance (4):



The above provides some illustration for the Urban Designer's view that the scheme fails to comply with NPPF policy TR4.

The applicant also suggests that the access gate to the semi-private area between blocks D and E will not be locked, and that it is instead intended to indicate to the public that they are entering a semi-private area. This is also unclear and does not align with the above extract of the Movement and Access diagram, which suggests that this route is 'residents only'. If this landscaped route is not available for public use, pedestrians have no other option than to walk along the service access road on the route illustrated by the red arrow above.

The applicant states that the area to the rear of Block D will be overlooked by the upper residential floors and that it would be secure from the public due to the access gate at High Street. As shown on the extract of the General Arrangement Ground Floor Plan below, this space appears to be accessible from the north unless this area will be made inaccessible by other boundary treatment. Due to the width of the space between the rear of Block A and the retained car park, there would be no meaningful overlooking from the upper residential floors as the angle of view would be too steep. The perception of this space as unwelcoming with dead-end conditions would not encourage use of the cycle stores and by extension, active travel.



In terms of Block A, Officers have been clear that the principle of a tall building is acceptable but that the design of the building is critical. The applicant suggests that Block A is a townscape marker, but the Council's questions what the building is marking and how this potential landmark building is contributing positively to the skyline. The building does not mark an important area of the site nor does it welcome people into the site from Mutton Lane. It is bounded by highway infrastructure and semi-private space. The proposed brick detailing is timid and would not read in longer range views. The top of the building similarly lacks an appropriate crown and the type of detailing shown will be lost in views from ground level.

Further with regards to design detailing, the architectural response to the 1930s Princes Parade to be replaced by Block D is very limited. Some balcony set-backs have been incorporated with limited height reductions. The resulting design is a weak response to the 1930s form, which is a missed opportunity where the scheme is otherwise taking inspiration from Potters Bar as an inter-war settlement with art deco influences.

Community Infrastructure Levy and Planning Obligations

In their response letter dated 30 September 2026, the applicant sets out various planning obligations sought and their view on whether these meet the CIL tests. The Council wishes to point out that obligations sought from Hertfordshire County Council in relation to highways, education, and waste infrastructure are typical of developments of this scale in the borough, and the Council has agreed numerous s.106 agreements with other applicants to secure these obligations. They are required mitigations to infrastructure to make the development acceptable in planning terms. It is noted that Hertfordshire County Council have provided their own justifications as to how their obligations meet the CIL tests and the Council would refer the Inspector to these.

It is also worth noting that the below which forms part of the site's draft allocation in the Regulation 19 Local Plan:

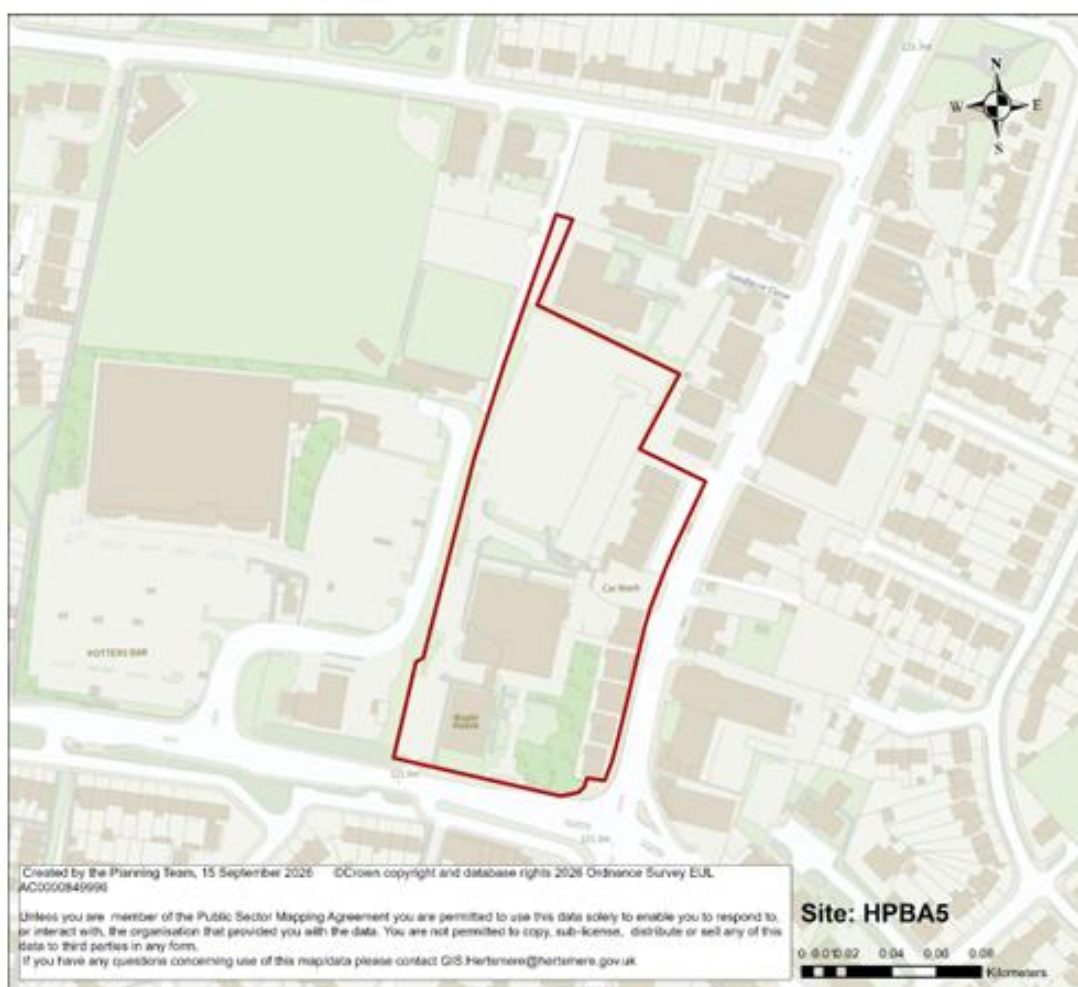
The delivery of the site allocation will enable transformative public realm enhancements to improve connections throughout the wider town centre area. This provides an opportunity to support the comprehensive regeneration of Potters Bar High Street District Centre. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.

Conclusion

The Council thanks the Inspector for the opportunity to submit the above comments and would be happy to answer any related questions at the upcoming Hearing.

Appendix A: Extract from the Hertsmere Regulation 19 Local Plan 2026

HPBA5 Canada Life Place



Site Address	Canada Life Place, Mutton Lane, Potters Bar		
Site Characteristics	Site Size ha	Setting	Ownership
	1.84 ha	Urban	Private
Current Uses	Comprised of one 13-storey office building on Mutton Lane, one 6-storey office building to the rear of the site, and several pairs of 2.5-storey buildings including residential uses and ground floor retail uses on High Street.		
How Site was Identified	Call for Sites process		
Planning Designations and Site Considerations	The site includes trees that are subject to TPOs. There are heritage considerations in respect of the setting of three Grade II Listed buildings, and potential considerations relating to two further Grade II Listed buildings. There is a degree of measurable surface water flood risk. The site lies within the Sand and Gravel and Drinking Water Safeguard Areas.		
Planning Status	25/1764/PD56M (Canada Life House only): Change of use from Class E (commercial) to 74no. Class C3 dwellinghouses. (Deemed consent; expiry: 09 Feb 2029).		

	26/0764/FUL (Canada Life House only): External alterations to facade and fenestration, removal of rooftop plant enclosure, and associated landscaping works. (Permission granted; expiry: 06 Aug 2029). Section 62A Planning Application: S62A/2026/0159/ (Maple House and High Street buildings only) Partial demolition of existing buildings (with retention of existing two-storey car park and substation) and redevelopment of the site to provide a mixed-use development comprising residential apartments (class C3) and flexible commercial floorspace (class E) across 4 blocks and associated internal roads, parking, drainage, landscaping, amenity space and associated works. (Awaiting decision – target date 05/11/2026)
Indicative Development Capacity	369 dwellings with main town centre uses

Timeframe for delivery



Strategic Objectives

- B A Thriving local economy**
- C The regeneration of Borehamwood and Potters Bar**
- E Meet the Borough's housing needs by delivering homes for everyone**
- F Delivering affordable homes**
- G Securing a greener Borough**
- H Responding to the climate emergency**
- I Celebrating our local identity**
- J Healthy and safe communities**
- K Securing the timely delivery of infrastructure**

Non-strategic policy

Existing planning consents

- 15.56 The site allocation benefits from two relevant extant consents. These relate to the redevelopment of Canada Life House for 74 residential units, with alterations to the façade and landscaping works:
- 25/1764/PD56M (Canada Life House only): Change of use from Class E (commercial) to 74no. Class C3 dwellinghouses. (Deemed consent; expiry: 09 Feb 2029), and
 - 26/0764/FUL (Canada Life House only): External alterations to facade and fenestration, removal of rooftop plant enclosure, and associated landscaping works. (Permission granted; expiry: 06 Aug 2029).
- 15.57 A planning application has been submitted (under Section 62A of the Town and Country Planning Act 1990) directly to the Secretary of State for the mixed-use

redevelopment of the buildings along the street frontage of the site, including the 13-storey Maple House (Mutton Lane) and the buildings along the High Street:

- S62A/2026/0159: the proposal includes 1,742 sqm of flexible Class E commercial floorspace within smaller units fronting the High Street and Mutton Lane; 293 dwellings comprising 14 x studios, 83 x 1-bed flats, 150 x 2-bed flats and 46 x 3-bed flats, within four residential blocks of between 4-15 storeys in height, situated around central courtyards; open space including LAPS and intergenerational play, and an ecologically rich landscaping strategy; and 125 car parking spaces in a retained 2-storey car park.

Site Allocation

- 15.58 The site allocation proposes an urban redevelopment that will deliver at least 369 homes during Years 1-10 of the plan period. It will be comprised of comprehensive mixed-use redevelopment including residential units and main town centre, commercial, leisure and cultural uses on the ground floor fronting High Street and Mutton Lane. It will deliver high-quality public realm and amenity space, and the design-led scheme will take full account of the constraints of the site, including the proximity of several Grade II Listed buildings and surface water flood risk. The development will secure other social and community infrastructure improvements, including proportionate investment in local public transport, public realm, and environmental enhancements. The latter is anticipated to include sustainable drainage solutions, improvements for nature in line with the aims of the LNRS.

Opportunities

- 15.59 The delivery of this accessible urban site provides an opportunity to achieve successful and sustainable place-making comprised of comprehensive mixed-use redevelopment that includes active main town centre uses at ground floor level and residential above. It will include genuinely affordable homes, investment in social and community infrastructure, improved public realm, and open space incorporating space for nature and will respond positively to the challenges of balancing growth and securing a thriving economy with minimising the impacts of the climate emergency.

Development Requirements

- 15.60 Development must be planned and delivered comprehensively in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). The implementation of the extant planning consent must be fully integrated with the rest of the site, particularly the relationship between building entrances, positive frontages, public spaces, the gateway to the High Street, and the approach to enhancing the setting and significance of nearby heritage assets.
- 15.61 The development must be design-led and consider how the capacity of the site can be optimised to deliver high intensity mixed-use development that provides positive frontages that address key routes and public spaces. This will incorporate high-

quality and high-density residential, active ground floor frontages in line with the Retail and Town Centre policies, and new and improved public realm and open space.

- 15.62 The masterplan must consider the site and its surroundings, including surface water flood risk, the relationship to High Street District Centre, and the significance of nearby heritage assets, particularly Ladbroke School. These considerations will inform the siting and massing of built form, open space and important views. The key location on the corner of the High Street and Mutton Lane will be addressed with a design that respects the existing urban form and better-defines the southern entrance to the High Street District Centre.
- 15.63 Residential accommodation must be of high-quality design and include at least 20% Affordable Housing in line with Policy H3 (Genuinely affordable housing).
- 15.64 The site will be fully integrated with the surrounding street network to improve access and permeability through onto the High Street, with enhanced walking and cycle connections including a functional link with the neighbouring Tesco Supermarket site. This may require reconfiguration of the site layout to achieve a hierarchy of routes that clearly articulate movement along east-west and north-south corridors.
- 15.65 The delivery of the site allocation will enable transformative public realm enhancements to improve connections throughout the wider town centre area. This provides an opportunity to support the comprehensive regeneration of Potters Bar High Street District Centre. The potential improvements that could be enabled and delivered through the comprehensive redevelopment of the site are set out as part of the Vision for Potters Bar. These will be funded through a combination of developer contributions (inclusive of CIL) and other sources of funding secured in support of Potters Bar's regeneration.
- 15.66 Development must be phased to ensure the timely provision of the infrastructure necessary to support the densification of this central urban site. This must include the timely investment in community infrastructure to meet demand arising from the development.
- 15.67 The site will deliver space for nature, including the provision of SuDS, Biodiversity Net Gain and urban greening in line with the relevant policies in Chapter 10 Green and Blue Infrastructure.

Development Guidelines

- 15.68 Existing buildings should be retained wherever possible to reduce the environmental impact of the proposals in terms of embodied carbon, however this should be balanced with the need to provide a high-quality development that fully addresses its location as a gateway to the High Street District Centre, and connects in with the neighbouring allocation at Tesco, Mutton Lane.
- 15.69 Development should provide a site-wide public realm strategy that aligns with and complements the regeneration of the wider High Street District Centre.
- 15.70 All residential units should benefit from positive aspects, orientation, daylight and ventilation, and the development should be well-integrated with the High Street District Centre and nearby heritage assets, in particular the Grade II Listed Ladbroke School and Cask and Stillage pub.
- 15.71 High-quality public spaces should be created within and around the development which are addressed by active building frontages. These should incorporate residential amenity space and play provision that addresses local shortfalls (LAPs), and appropriate planting for biodiversity benefit and urban greening as required by the policies in the Green and Blue Infrastructure section of this Plan.
- 15.72 Development must respond positively to heritage assets including nearby listed buildings including Ladbroke School, High Street; The White Horse Public House (Cask & Stillage), 19 High Street; and The Lion Public House (Potty's Diner), 2 Barnet Road. Consideration must also be given to two further Grade II listed buildings: Salisbury House, 82 High Street and War Memorial at St John's Churchyard, High Street.
- 15.73 Development should prioritise active travel modes over parking and vehicular access in line with the Local Transport Plan and LCWIP proposals. The masterplan will include a forward-facing car parking strategy that introduces maximum standards for the site that will secure a shift towards a car-lite/car-free future.
- 15.74 The site has a low level of measurable surface water flood risk and will be subject to the Sequential and possibly the Exception Test. Developers should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against potential flood risk.