

Addendum to Representation of 11 September 2026

Application S62A/2026/0159 – Maple House, Nos 8-16 (even) & 30-32 High Street and nos 1-7 Princes Parade, Potters Bar EN6 5BA

Hearing 14–15 October 2026 · Submitted by Daniel Bone MA Dip Arch RIBA MRTPI MAPM (Rtd) · October 2026

1. PURPOSE OF THIS ADDENDUM

I made a representation on 11 September 2026. This short addendum supplements it. It relates to the main issue in the Issues Report of whether the development would provide an acceptable standard of living accommodation for future occupiers (paragraphs 36–41), and to the concern about single-aspect layouts and overheating noted at paragraph 49. Where it differs from my earlier representation, this note should be preferred. In particular, I referred there to “Codes” CC2 and CC3; the correct references are Policy CC2 (Mitigation of climate change) and Policy CC3 (Adaptation to climate change) of the August 2026 Framework, and I do not suggest that either sets a test beyond its wording.

I write as a local resident and as an architect who was part of the original design team for Canada Life Place at Rock Townsend (Associate, 1985–1990). I welcome new homes on this site. I met the applicant’s Development Director on 21 May 2026 and the following day shared outline ideas for the adjoining building. He replied that he would consider them with the architect, and a site visit with my colleague Michael Coombs and the applicant’s technical team took place on 23 June 2026. I have not had a substantive response on the proposals since, but my offer to discuss them remains open. I did not ask to speak, so I submit this in writing and would be glad to answer any questions the Inspector may have.

2. THE TYPOLOGICAL LINK: FROM CONVERSION TO NEW BUILD

Canada Life Place adjoins the application site but lies outside it (Issues Report, paragraph 8). I mention it only because the two share a setting and a microclimate, and because the applicant’s announcement of its purchase in May 2025 presented the Canada Life site as a single redevelopment opportunity.

My concern is with the new blocks. Taking Block E as an example (applicant’s drawings 20500 P09 and 20503 P08), the plans show a central corridor with homes on either side. As I read them, corner homes have two aspects but most others have windows on one side only, broadly facing east or west. The applicant’s Overheating Assessment (Whitecode Consulting, 2 July 2026) says dual-aspect homes will be provided where possible. I would ask how many homes that covers, and how many single-aspect homes face south, east or west.

The assessment shows the sampled rooms passing TM59 and Part O, but compliance relies on purge fans (50 l/s per habitable room, triggered above 23°C) and, because of noise, on bedroom windows remaining shut overnight, as paragraph 38 of the Issues Report also records. A top-floor home in Block E failed at first and was addressed with opaque panels.

I have prepared two indicative sketches (7 and 8) on the applicant’s Block E plans, showing one way the central corridor might be opened up with lightwells to bring daylight and a route for air. They are not a design. To make room for the lightwells they widen the central corridor zone by roughly 3 metres across the block, which would mean deepening the building or rebalancing the layouts; the homes are shown loosely rather than redrawn, and unit sizes, trees and daylight would need to be resolved by the applicant’s architects. They would need testing against fire strategy, accessibility, acoustics and thermal modelling, and are offered for the applicant’s team to consider in a collaborative spirit. Block E is a worked example (the sketches show its southern part); other blocks are arranged differently. By “hybrid” I mean natural ventilation routes with mechanical assistance only where modelling shows it is needed. Base drawings © Arney Fender Katsalidis (AFK Architects), adapted from the application documents (drawings 20500 and 20503); the adaptations and annotations are mine.

3. THE REVISED NPPF (AUGUST 2026)

The Issues Report applies the August 2026 Framework (for example policies S4 and HE6), so I refer to the same document.

Policy CC3(1) asks development to take account of the current and potential impacts of climate change over the lifetime of the scheme. CC3(1)(d) asks for design approaches that minimise overheating risk (through DP3(2)(b)) and for green infrastructure and suitable tree planting (through DP3(2)(c) and N3). I recognise that policy DM7 says planning should not duplicate other regimes such as the Building Regulations. My point is that layout, aspect, orientation, shading and planting are settled at the planning stage and cannot be put right afterwards under Part O.

Policy CC2(1)(c) and (d) refer to conserving energy and resources and to taking opportunities to reuse existing structures and materials. Block A lies in the approximate location of Maple House (Issues Report, paragraph 10), and the Council's committee report of 3 September 2026 records that all structures other than Canada Life Place, the two-storey car park and the substation are to be demolished. I understand a prior approval to convert Maple House to homes was also sought (25/1763/PD56M). I would ask the applicant to explain how reuse was considered, including any embodied-carbon comparison.

4. CIBSE DATA AND THE LESSONS OF SUMMER 2026

CIBSE published TM59:2026 in early July 2026. From published summaries, it asks for an unconstrained assessment using 2050s Design Summer Year weather files, follows a three-stage process that begins with passive measures and moves to mechanical measures only if needed, and requires communal spaces to be assessed. I would ask the applicant to confirm this against CIBSE's publication.

The applicant's assessment follows TM59:2017 using the 2020s DSY1 London Gatwick file, and I could not find a 2050s unconstrained run in it. I make no claim that the homes would fail. The new 2050s files may in some respects be less onerous than the earlier ones, and the result may well be acceptable. My point is that, with CC3 looking to the lifetime of the scheme and this summer's hot weather fresh in mind, the test should be run and the passive measures shown. I do not know whether Approved Document O has yet been updated to refer to the new edition.

5. CONCLUSION AND REQUEST TO THE INSPECTORATE

I respectfully ask the Inspector to:

- treat resilience to overheating over the lifetime of the scheme as part of the standard of living accommodation issue;
- consider asking the applicant how many homes are single aspect and face south, east or west, whether an unconstrained TM59:2026 assessment using 2050s weather files has been carried out, and how CC3(1)(d) and N3 have informed the layouts and landscaping; and
- consider conditions along the following indicative lines, subject to the views of the Council and the applicant.

Overheating. No above-ground construction of a residential block shall commence until an overheating assessment for that block, prepared using CIBSE TM59:2026 (including the unconstrained assessment using the 2050s Design Summer Year weather files), has been submitted to and approved in writing by the local planning authority. The assessment shall set out the passive measures to be provided (including shading, glazing specification, openings and ventilation routes) and any residual mechanical measures. The approved measures shall be implemented before first occupation and retained thereafter.

Green infrastructure. Before first occupation of any residential block, details of tree and other planting for the communal courtyards and block frontages, designed to provide summer shading and cooling as well as amenity, shall be submitted to and approved in writing by the local planning authority (to the extent not already shown on the approved landscape drawings) and implemented in the first planting season after occupation.

I would welcome the opportunity to discuss these ideas with the applicant and the Council, and to share what I know of the design of the adjoining building. I am not seeking to prevent new homes on this site; I want them to stay comfortable for the people who will live in them.

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Accompanying sketches: Sketch 7 (Block E ground floor, southern part) and Sketch 8 (Block E levels 1–3, southern part).