Stevenage Borough Council

Local Plan - Partial Update

Representations to the Main Modifications consultation

18 February – 31 March 2026

Representations

ID number	Name of Respondent
SBC_001	National Grid Electricity Transmission
SBC_002	Hertfordshire Gardens Trust
SBC_003	Natural England
SBC_004	Historic England
SBC_005	Environment Agency
SBC_006	National Highways
SBC_007	NHS HWE ICB
SBC_008	Hertfordshire County Council
SBC_009	McCarthy Stone and Churchill Living

SBC_001	National Grid Electricity Transmission

fisher german

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

t. 01530 412821
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Our Ref: 105181-024

26 March 2026

Stevenage Borough Council
Planning.Policy_SBC@stevenage.gov.uk
via email only

Dear Sir /Madam,

Stevenage Borough LP Partial Update Main Modifications February – March 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site	Asset Description
Policy HO3: North of Stevenage	4TB ROUTE TWR (002 – 074) - 400Kv Overhead Transmission Line route: PELHAM – SUNDON and PELHAM - WYMONDLEY MAIN

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Policy EC1: Allocated sites for employment development (EC1/4 Land west of North Road)	4TB ROUTE TWR (002 – 074) - 400Kv Overhead Transmission Line route: PELHAM – SUNDON and PELHAM - WYMONDLEY MAIN

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

With the above in mind, Fisher German submitted representations on behalf of NGET in response to the Stevenage Local Plan Partial Update Regulation 19 Consultation in August 2025. In that response, we raised a number of issues relating to Policy HO3 (North of Stevenage) and Policy EC1 (Allocated Sites for Employment Development). These issues remain, even in the Main Modifications version of the document and we consider that for the related policies to be effective – i.e. sound – these issues need to be resolved.

Minded that there have been some alterations to referencing as a result of changes elsewhere in the document, I summarise our current and updated position below and clearly outline our specific requests. Of particular note is that the link to guidance where it is provided, is incorrect and thus does not currently perform any useful function as part of the document therefore. We provide an updated link below.

Polic HO3: North of Stevenage

This site has the above listed asset interacting with it through the central part of the allocation. We continue to agree with the inclusion of HO3(o) which makes clear that development proposals must

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demonstrate that an appropriate buffer around existing power lines is incorporated for development proposals to be permitted. We also agree with provisions at 9.34 which recognises the asset as a constraint and further requires implementation of a suitable buffer. However we ask that the relevant guidance be referred to within a footnote, as with footnote 68 (previously footnote 57) to ensure consistency in approach to addressing the constraint across numerous sites. The updated link to provide is provided below in relation to Policy EC1.

Policy EC1: Allocated sites for employment development (EC1/4 Land west of North Road) and (EC1/7 Land west of Junction 8)

Both these sites have the above listed asset interacting with them, to varying degrees. In recognition of this, we support the continued inclusion of the following text, in reference to EC1/4, within Policy EC1: "*Development proposals will need to have regard to the constraints on this site and, in particular, ensure appropriate clearances from the overhead lines*" but ask that EC1 be adapted to reference both the above sites, not just EC1/4. For additional clarity, a suitable location for this might be within the site discussion at 6.7 of the policy.

We also support the direct reference to National Grid guidance. However the link provided in footnote to the plan (footnote 68 – previously 57) is no longer active and should be updated to the most recent version as follows:

https://www.nationalgrid.com/document/345326/download

Without appropriate acknowledgement of the NGET assets present within the sites, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure and we must continue to object on this basis.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
- Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.

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- Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
- Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
- Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

[redacted]

Tiffany Bates, Development Liaison Officer

[redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

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Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

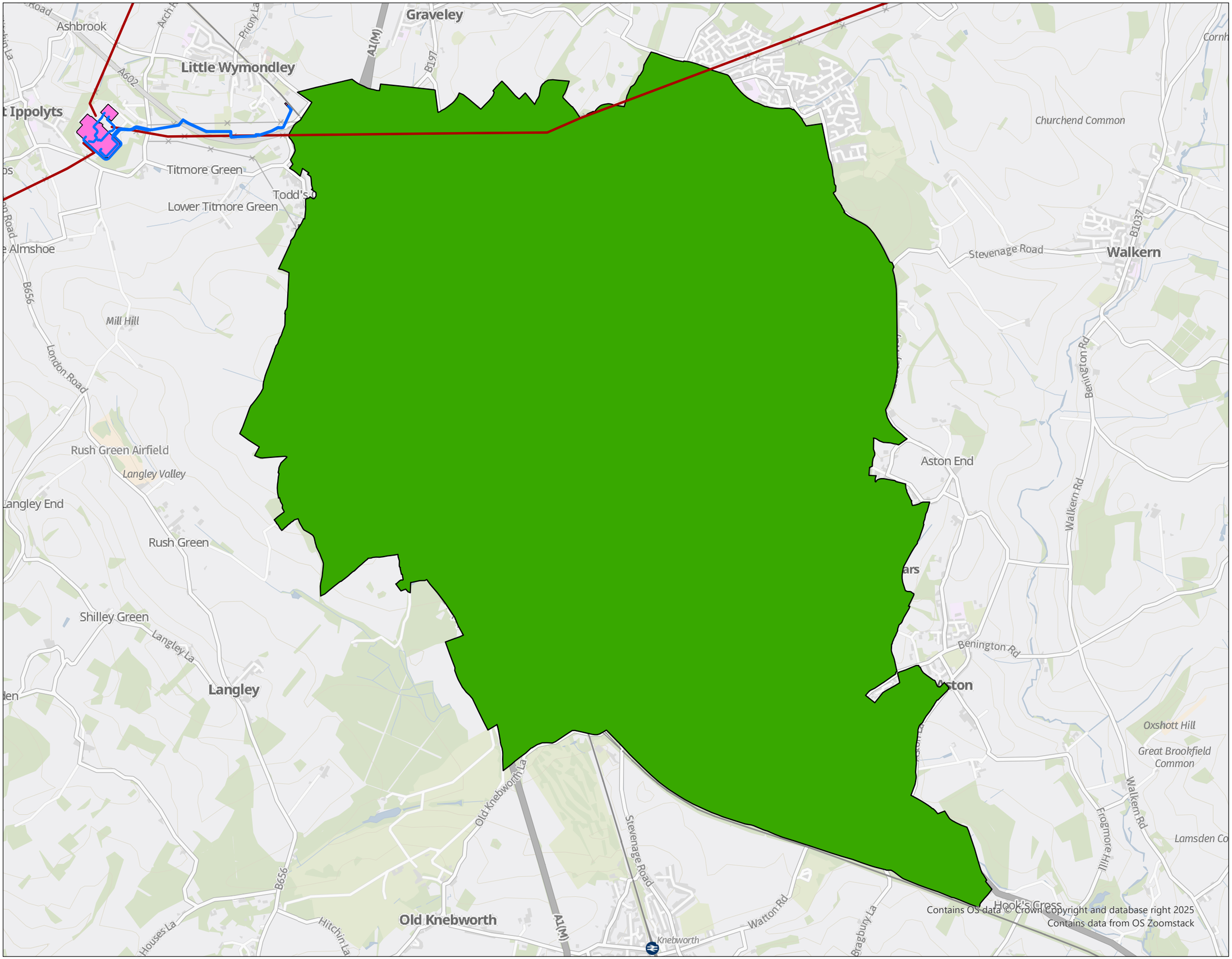
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

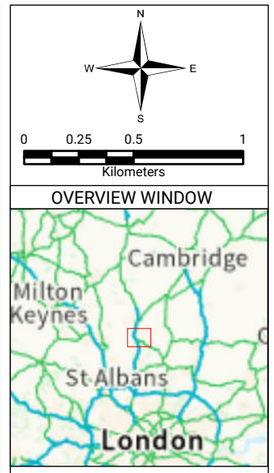
How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

[redacted]

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LEGEND:
- Cable
- OHL
- Substation
- LPA Area

REVISION: A

CLIENT: nationalgrid

SCHEME:
PLANNING INTERACTION

TITLE:
LPA ASSET INTERACTION

FP: 105181-024

SCALE: 1:28,000 @ A3
DATE: 20/05/2025

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The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ
01530 412821
fishergerman.co.uk

DRAWING REF:
NG-2025-03-MT-OP-LPA- Stevenage

SBC_002	Hertfordshire Gardens Trust

Stevenage Local Plan: Partial Update – Main Modifications
Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Please return to Stevenage Borough Council BY 11:59pm on 31 March 2026.

As this form will be issued and received by Stevenage Borough Council, the Council is responsible for handling any personal information submitted on or with it in accordance with data protection legislation. Please read the Council's privacy policy for more information. www.stevenage.gov.uk/about-the-council/access-to-information/privacy-notices/privacy-policy

Please note that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State who conducted the examination (i.e. the Inspector) and a representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Stevenage Borough Council's website.

This form has two parts:
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*		
Title	Mrs	
First Name	Kate	
Last Name	Harwood	
Job Title (where relevant)	Conservation & Planning	
Organisation (where relevant)	Hertfordshire Gardens Trust	
Address Line 1		
Line 2		
Line 3		

Line 4		
Postcode		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	All MM	Policy		Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet / expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We have no comment to make on the proposed modifications which are outside of the area of interest and remit of Hertfordshire Gardens Trust.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

7. Any other comments

SBC_003	Natural England

Outlook

[External] FAO Planning Policy Team REF: Local Plan Partial Update – Consultation on Main Modifications

From SM-NE-Consultations (NE) [redacted]
Date Wed 3/11/2026 11:19 AM
To [redacted]

Your Ref: Local Plan Partial Update – Consultation on Main Modifications
Our Ref: 541638

Dear Sir or Madam

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the Main Modifications for the Local Plan, Sustainability Appraisal, Habitats Regulations Assessment or Appropriate Assessment for the Stevenage Borough Council.
We agree with your conclusions on these screening reports.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England
Worcester Team
[redacted]



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the

SBC_004	Historic England

Outlook

[External] Re: SA for Stevenage Borough Council Local Plan Partial Update - Main Modifications

[redacted]

Dear Sally,

Re: SA for Stevenage Borough Council Local Plan Partial Update - Main Modifications

Thank you for inviting us to comment on the Council's Main Modifications, the updated Sustainability Appraisal, and the HRA / Appropriate Assessment. Having reviewed the documents, I can confirm that we have no specific comments on the modifications themselves, and we agree with the conclusions of the SA and the Appropriate Assessment that the previous assessment remains valid.

I would be grateful if you could confirm receipt of this email.

Kind regards,

Andrew Marsh BSc MA MRTPI

[redacted]

Historic England
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www.historicengland.org.uk

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[redacted]

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[redacted]

SBC_005	Environment Agency

Planning Policy Team
Stevenage Borough Council
Daneshill House
Danestreet
Stevenage
Herts
SG1 1HN

Date: 30 March 2026

Dear Stevenage Planning Policy Team,

Stevenage Borough Council Local Plan – Main Modifications Consultation

Thank you for consulting us on the above planning policy consultation. Following a review of the Main Modifications, we have the following comments.

Evidence Base

In our response to the Regulation 19 Consultation, we highlighted the need for an updated Strategic Flood Risk Assessment (SFRA). This has not been completed. We expect that *if* the Local Plan is adopted, you must begin work on an updated SFRA within 6 months. If it is not adopted, an updated SFRA should be produced as part of any revised Local Plan consultation.

Main Modifications

MM37 – Policy FP2

We do not agree with MM37.

First, we disagree that the policy language is softened from *must* to *should*. It is a requirement to ensure flood risk is appropriately managed and therefore it is not unreasonable to expect that new developments **must** adhere to the policy.

In addition to this, we are particularly concerned with the removal of 'provide an 8m undeveloped buffer zone from the top of the bank of main rivers' from the policy wording. We strongly recommend that it is reincorporated into the modified wording. We've set out a recommendation for this below:

> *"Provide an undeveloped buffer zone **of 8m** from the top of the bank of any adjacent main rivers **or 3m from the top of the bank of adjacent** ordinary watercourses;"*

We also disagree with the change of wording to an all-encompassing 'All development proposals will be assessed against national planning policies for flood

risk'. We strongly encourage local authorities to have their own local policy requirements for flood risk.

We therefore suggest that the original specific policy points (a, b, c, d, g, i and j) are reinstated, to go alongside the modified 'new' list of a, b and c.

Our concerns about MM37's alterations to the policy wording for FP2 are further amplified by the fact that the SFRA is out of date and no new SFRA has been submitted in support of the Local Plan.

Other Main Modifications

We have no comments on the rest of the main modifications proposed.

Final Comments
Thank you again for seeking our comments on the Local Plan Partial Review and Update Main Modifications. We trust that the comments presented in this letter are clear and informative and would welcome the opportunity to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely

Harry Scott
Planning Specialist
[redacted]

SBC_006	National Highways

[redacted]

Outlook

[External] NH Comments - NH/26/15146 - Stevenage Borough Local Plan Partial Update – Consultation on Main Modifications

[redacted]

Dear Stevenage Borough Council Planning Policy Team,

Many thanks for consulting National Highways on the proposed Main Modifications for the Local Plan Partial Update. Having reviewed the proposals, National Highways would wish to make no comments on the amendments.

Thank you for consulting with National Highways and please continue to consult on other planning applications [redacted]

Regards,

Matt Lewis (he/him) Spatial Planner
Planning and Development
[redacted]

[redacted]

Local Plan Partial Update – Consultation on Modifications

Dear Consultee,

Stevenage Borough Council's Local Plan Partial Update is in the final stages of review since undergoing public examination in December 2025. The Planning Inspectorate assigned an Inspector to review the proposed changes and has proposed main modifications to make it sound.

We are seeking your views on these modifications.

The consultation is now open until Tuesday 31 March 2026.

All information regarding the consultation can be found on our consultation website here:
https://www.stevenage.gov.uk/have-your-say/planning-policy-consultations
https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/local-plan-partial-update/main-modifications-post-eip-hearings

What is the Local Plan Partial Update and Main Modifications?

SBC_007	NHS HWE ICB

[redacted]

Outlook

[External] NHS HWE ICB_ Stevenage Local Plan Partial Update_ Main Modifications

[redacted]

Dear Sir/ Madam,

Thank you for consulting the NHS HWE ICB on the Local Plan Partial Update Main Modifications. I have reviewed main modification 9 (MM9) relating to the proposed changes to Policy CC1: Energy Efficiency. The HWE ICB raised concerns with Policy CC1 at the Regulation 18 and 19 consultation stages on the grounds that any major development proposals for Stevenage brought forward by the NHS from 2026 onwards would likely to be contrary to Policy CC1, due to the Council's locally set and earlier net zero target dates when compared to the NHS' later set targets . As such the NHS was duly concerned that this will may impact on the delivery of capital projects and the provision of adequate health services and infrastructure to meet housing growth in the borough.

The proposed changes to Policy CC1 now allow for the policy to be applied flexibly, recognising that it may not always be appropriate to achieve zero emissions; covering instances where it may not be technically feasible, financially viable, or would otherwise compromise the delivery of sustainable development. This clarity, allowing the Council to apply Policy CC1 to decisions on planning applications flexibly is welcomed and supported by the NHS HWE ICB.

Kind regards,

Rachael

Rachael Donovan
Town Planning Policy Manager
Hertfordshire and West Essex ICB
[redacted]

Hertfordshire and West Essex Integrated Care System

NHS Hertfordshire and West Essex Integrated Care Board

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** **********

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SBC_008	Hertfordshire County Council (HCC)

[redacted]

Outlook

[External] HCC response to the SBC Local Plan Main Modifications consultation

[redacted]

Dear Planning Policy at Stevenage Borough Council,

Thank you for consulting HCC on the Stevenage Local Plan Partial Update & Review Main Modifications. HCC has the following comments to make.

MM8 - Policy SP11

- No comments.

MM11 – Policy CC3

- Welcome changes to para 6A.26 and 27

MM18 – Policy TC4

- Welcome the requirement for a comprehensive strategic masterplan for the entire allocation. HCC would like to be involved in the creation of this masterplan, particularly consultations associated with this work. HCC welcomes the re-use of the good work produced for the AAP in this replacement masterplan process.

MM32 - Policy HO10

- HCC welcomes the support for sheltered and supported housing schemes.

MM33 - Policy HO11

- No comments.

MM36 – Policy FP1

- No issues with the changes to the first paragraph
- We would see the updating of "SuDS proposals *must*" to "should" as a step backwards. If SuDS proposals do not ensure that peak discharge rates from the site will not increase, then that is likely to increase flood risk, as it not achieving greenfield run-off rates on greenfield sites, etc.
- We would see the removal of the sentence seeking to refuse the discharge of surface water to foul sewers as a downgrade. Foul sewer networks are not designed to accommodate surface water flows and would never normally accept "clean" surface water runoff. Discharging surface water runoff to foul sewers is likely to increase flood risk, is not in accordance with PPG in which the foul sewer is not listed as a viable discharge location, and is contrary to paragraph 1.10 of the National Standards for SuDS (2025), which states "Surface water runoff from the development shall not discharge to a foul drainage system." It is understood if the LPA considers the above (regarding PPG and the National Standards for SuDS) as sufficient national guidance, and because it is not included in Table 4 (page 183) of the Local Plan, that it is not necessary to stipulate this in the Local Plan itself – however it does make this aspect less robust.
- Removal of the paragraph "proposals reliant on underground attenuations… will be refused" is reasonable provided the SuDS hierarchy is shown to be explored and there are no scope to provide SuDS attenuation in above-ground features.
- Removal of the paragraph "At the application stage, development proposals involving SuDS…" is reasonable as this is covered by NPPF / PPG.

MM37 – Policy FP2

- The updated wording is less robust for flood risk management, however much of what has been removed is covered by national legislation/guidance.
- FP2 part C regarding watercourses is in accordance with the **draft** NPPF which includes new policy on re-naturalisation of watercourses where flood risk would not be increased as a result.
- A 3m undeveloped buffer from ordinary watercourses is a local LLFA requirement that we will be seeking at application stage – this is to ensure that watercourses can be accessed for maintenance by the relevant landowner(s).
- The removal of "must" in favour of "should" with regards to protecting existing flood defences including allowing space for maintenance access etc is less robust.

MM38 – Policy NH5

- Part ‘b’ states “replacement trees or planting are provided which are; i Of equal or better quality than the trees which are lost...”. How is quality to be defined. Clarity on this term should be provided (size, condition, suitability of species for location etc). This term is too open for interpretation.

HCC would like to be kept up to date with future consultations or updates associated with the Stevenage Local Plan.

Kind regards,

Xavier Preston
Senior Planning Officer | Growth and Environment
Hertfordshire County Council
[redacted]
Hertfordshire, guided by our RISE values
We improve Residents' lives | We work with Integrity | We act Sustainably | We champion Equality & fairness

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SBC_009	McCarthy Stone and Churchill Living

The Planning Bureau Limited

Bournemouth • Coventry • Hatfield • Manchester • Ringwood • Woking • York

Planning Policy
Stevenage Borough Council
Daneshill House
Danestrete
Stevenage
SG1 1HN.

[redacted]

30th March 2026

Dear Sir / Madam

McCARTHY STONE & CHURCHILL LIVING RESPONSE TO THE STEVENAGE LOCAL PLAN MAIN MODIFICATIONS CONSULATION.

Thank you for the opportunity to comment on the Stevenage Local Plan main modifications consultation.

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

With respect to MM32 and MM33 we support the flexibility introduced by the main modifications.

Thank you for the opportunity for comment.

Yours faithfully

N. Styles

Natasha Styles
Senior Planning Associate

[redacted]