



Our Ref:
Your Ref: NH/24/08221

Steffan Saunders
Head of Planning
Directorate of Place and Prosperity
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
DE11 0AH

Catherine Townend
Spatial Planner
Operations Directorate (Midlands)
National Highways
Three Snowhill
Snow Hill Queensway
Birmingham
B4 6GA

Via Email: local.plan@southderbyshire.gov.uk

www.nationalhighways.co.uk

16 June 2026

Dear Steffan,

Regulation 19 Addendum: Proposed Modifications to South Derbyshire Local Plan Part 1 Review Publication Version (2022-2041) Consultation

National Highways welcomes the opportunity to comment on the Proposed Modifications to South Derbyshire Local Plan Part 1 2022-2041 (Publication version March 2025). We commented on the last version of the draft Local Plan Part 1 (version March 2025) in April 2025 and Part 2 (version November 2025) in January 2026.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In relation to this consultation, National Highways' principal interest is in safeguarding the operation of the A38 and A50 trunk roads which route through the area.

In responding to Local Plan consultations, we consider the Department for Transport (DfT) revised Circular 01/2022 – *Strategic Road Network and the delivery of sustainable development* ('the Circular'), which sets out how interactions with the SRN should be considered in the making of Local Plans. Paragraph 28 of the Circular sets out that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

In this context, National Highways expects the Local Plan to ensure that site options and development management policies do not rely on the SRN to provide local access or capacity for development, and that opportunities to reduce reliance on private car travel are embedded at the plan-making stage.

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the NPPF and other relevant policies, which helps to ensure the soundness of the Local Plan is being appropriately considered (from a transport perspective).

We note that the Local Plan period has been extended to 2042 from 2041 as part of this consultation however our comments largely remain as previously provided. Our comments regarding the modifications are set out below.

Housing Requirement (PM3, PM4 & PM42)

To the end of the Local Plan period, there is a requirement for 15,263 dwellings to be delivered to meet South Derbyshire's own need (10,140) and to help meet Derby City's unmet need (5,123). Within the Local Plan 13,064 dwellings are allocated and up to 2,390 additional dwellings can be provided through windfall sites or large unallocated sites with planning permission. As such the Local Plan Part 1 will meet the district's full housing requirement.

A new housing led strategic site: FLG 1, has been proposed at Brun Lane, Mackworth, comprising 250 dwellings. National Highways would expect the developer to assess its potential impact on the A38, in particular the A38 / A52 signalised roundabout (Markeaton Roundabout).

Employment allocations (PM5, PM8 & PM17)

With the modifications, two of the employment strategic sites; STRA 1: Infinity Garden Village; STRA 2: Land South of Mickleover shall include an anchor store of

approximately 1,000 square meters. We will require further details of the proposed sites in the form of land uses and floor area, such that the overall potential need for traffic impacts and mitigation can be determined.

Transport Evidence Base

National Highways expects that the growth proposals in the Local Plan will be supported by proportionate and up-to-date transport evidence. This should demonstrate that the cumulative impacts of proposed non-strategic allocations, when considered alongside the strategic growth in the Local Plan Part 1 Review and development in neighbouring authorities, can be accommodated on both the local highway network and the SRN. Where relevant, this evidence should consider junction performance, network resilience and in-combination effects.

Any potential sites anticipated to have an impact on the SRN in the area are to be subject to consultation with National Highways, and appropriately assessed in line with the Department for Transport (DfT) Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Depending on the scale of likely impact on the SRN, suitable mitigation will be required to be identified and secured in line with the principles set out in Circular 01/2022.

Duty to Co-operate

While we acknowledge the Council's dedication to collaborating with neighbouring authorities and relevant bodies to achieve sustainable development, we recommend a coordinated approach for any developments impacting neighbouring local authorities. This approach should involve a joint approach with National Highways, South Derbyshire District Council, other local authorities, and future developers or applicants. Such collaboration will ensure that all parties' interests are safeguarded and a unified solution is reached.

National Highways will actively work with South Derbyshire District Council to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.

We have no further comments to provide at this stage and would welcome continued engagement with the South Derbyshire District Council in order to support the delivery of the planned growth.

In the meantime, if you have any questions or comments then please do not hesitate to contact me on the details provided, and through our email address PlanningM@nationalhighways.co.uk

Yours sincerely,

Catherine Townend

Spatial Planner

Email: [REDACTED]