



Our ref: NH/25/13635

Matt Lewis
Spatial Planner - East Region



16 February 2026

Dear Milton Keynes NCP Engagement Team,

Milton Keynes City Plan 2050 - Regulation 19 Consultation

Thank you for consulting National Highways on the submission of the Milton Keynes City Plan 2050 Regulation 19.

National Highways has been appointed by the Secretary of State for Transport as a 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). 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 respect of the Local Plan, National Highways comments will predominantly be in relation to the SRN, which in this case includes (but not limited to) the M1, A5 and A421.

In responding to local plan consultation, we have regard to DfT Circular 01/2022 "The 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. In addition to the Circular, the response set out below is in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

It should be noted that National Highways submitted a previous consultation response dated 24 December 2025. Since then, we have been in correspondence with Milton Keynes City Council to address the issues raised in our response.

This response will not repeat previous comments made in our last response but will highlight the key points raised and the progress made towards addressing our previous Regulation 19 response.



Strategic Modelling Update

In reviewing the submitted document “*Milton Keynes Multi-Modal Transport Model: Milton Keynes City Plan Forecasting Report (November 2025)*”, it was noted that the outputs were built on an assumed “Reference Case” which was referenced as being in the document “*Milton Keynes Multi-Modal Model 2019 - Forecasting Report v3.1 (February 2025)*”.

This document was not submitted as part of the suite of Local Plan evidence but was provided by Milton Keynes City Council on request. This document has since been reviewed and accepted by National Highways.

The combination of both reports indicates that the Local Plan includes the minimum quantum of housing to be delivered (c.51,000) plus an additional buffer to account for windfall developments. The model has also tested an additional percentage above this (c.63,000 in total) to model a worst-case scenario.

It has been discussed and agreed with Milton Keynes City Council that the delivery of just the 51,000 dwellings is an unlikely scenario, and the increase in dwellings in the model is considered robust. Notwithstanding this, the model does appear to test significantly in excess of this which may result in the model presenting issues at junctions on the SRN which may not come to fruition.

Based on the presented evidence, National Highways has requested Milton Keynes City Council to further investigate the SRN junctions along the A5 corridor. It is acknowledged that recent schemes along this corridor have already been implemented and completed since the time of developing the Local Plan model, which may have already resulted in improved efficiencies at these locations. Milton Keynes City Council will also be investigating if the over assumption of dwellings would have a significant impact on the junction performance in this location.

Milton Keynes City Council has confirmed that junction level modelling can be carried out should the above work indicating further detailed assessment is required. Whilst the need for junction level modelling can be ascertained prior to the planned submission date, the model work will likely extend past this but can be worked through within the timescales prior to examination hearing.

National Highways is willing to continue to work collaboratively with Milton Keynes City Council and their consultants to support the development and review of further strategic and junction-level modelling, including advice on scope and approach where appropriate. Early engagement will be essential to ensure that future work is proportionate, targeted and capable of resolving the identified risks.

Universal Theme Park SDO

National Highways recognises that this work may not be completed prior to a March submission; however, a clear commitment and programme for its inclusion should be set out.

To support this, National Highways is preparing a technical note setting out a consistent methodology for incorporating the Universal Theme Park development into strategic transport modelling, which will be issued to all relevant local authorities in the area by the end of February 2026. National Highways requests Milton Keynes City Council to review this guidance and to engage proactively with National Highways on the application of this methodology to the City Plan modelling work.

Conclusion

National Highways has reviewed the Regulation 19 consultation documents associated with the emerging Milton Keynes City Plan 2050. The review has focused on the A5, M1 and A421 SRN corridors due to their proximity to, and interaction with, the proposed scale and distribution of growth.

In line with the above comments, National Highways considers that further plan-level transport work is required for the Plan to demonstrate that cumulative impacts on the SRN have been adequately assessed and mitigated where required.

National Highways would like to continue working closely with MKCC with the aim of resolving these issues. National Highways is committed to continue to work with you in a collaborative and constructive manor to support the progression of the plan.

We trust the above comments are useful in the progression of your proposals and welcome continued discussions with the council to this end. Should you have any queries or wish to provide any further information to review, please do not hesitate to contact

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Yours sincerely,

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Matt Lewis
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Planning and Development

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