Our ref: NH/25/13635

Matt Lewis
[redacted]

24 December 2025

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.

As part of National Highways’ review, in addition to the relevant aspects of the main Local Plan document, there are several other supporting documents that inform the Local Plan, which have been reviewed at a high level where necessary. These documents are:

- Milton Keynes Infrastructure Delivery Plan (IDP) (November 2025);
- Strategic Housing Land Availability Assessment (November 2025);

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- Strategic Housing Land Availability Assessment Methodology (October 2025);
- Milton Keynes Multi-Modal Transport Testing (October 2025);
- Milton Keynes Multi-Modal Transport Model: Milton Keynes City Plan Forecasting Report (November 2025);
- Our Growth Strategy: MK City Plan 2050 Topic Paper (November 2025);
- Transport and Movement: MK City Plan 2050 Topic Paper (November 2025); and
- Central Milton Keynes: MK City Plan 2050 Topic Paper (November 2025).

Milton Keynes City Council have worked closely with National Highways on transport and highways matters during the preparation of the new local plan; including regular meetings and updates since the previous Regulation 18 Consultation in July 2024.

Local Plan context and SRN considerations

The plan commits to the delivery of a minimum of 50,372 (net) new homes over the course of the 2022-2050 plan period with a planned total of 59,779 homes to provide flexibility and a buffer against under-delivery. This includes around 15,000 affordable homes and 69 new pitches for Gypsies and Travellers. The plan also provides for significant employment growth, including approximately 300,000 sqm of office floorspace in Central Milton Keynes and 207.5 hectares of employment land across the city, alongside mixed-use development in strategic extensions.

In terms of growth and infrastructure, the plan proposes a balanced growth strategy delivering 59,779 homes through:

- Urban intensification: Around 20,500 homes within the existing built-up area, including Central Milton Keynes and Metro corridors.
- Strategic City Extensions: Five major greenfield allocations, including the Eastern Strategic City Extension (16,000 homes in total, 7,750 by 2050).
- Brownfield redevelopment: Wolverton Railway Works and Walton Campus

Where allocations are close to or adjacent to our network, early consideration will be required in relation to noise, air quality and drainage. National Highways does not permit the installation of noise barriers or bunds on our network, nor does it accept third party runoff into its drainage systems. These constraints will need to be addressed through early design and appropriate mitigation on third party land to achieve acceptable outcomes.

National Highways supports the ambition within the Plan to promote sustainable travel, including proposals for mass rapid transit, public transport improvements and active travel networks. However, while sustainable travel measures are essential, they do not remove

the need to demonstrate that impacts on the SRN can be mitigated and that the required infrastructure can be delivered in step with growth.

In National Highways' assessment, the scale, distribution and phasing of allocations proposed in the City Plan have the potential to give rise to significant cumulative impacts on the SRN. A number of the largest housing and mixed-use allocations are located in close proximity to the M1, A5 and A421 corridors, and several are expected to come forward within overlapping timeframes. When considered collectively, rather than on a site-by-site basis, this pattern of growth presents a material risk to the operation and resilience of the SRN.

At present, there is insufficient plan-level evidence to demonstrate that the cumulative impacts arising from the proposed allocations can be safely and efficiently accommodated, or that appropriate mitigation can be delivered in step with growth.

The Plan does not clearly address how the Government's New Towns ambition, as referenced by MHCLG, relates to the City Plan strategy and growth assumptions. Milton Keynes has been identified as having the potential to deliver around 40,000 new homes through this programme. While it is recognised that some of this quantum may fall outside the Local Plan period, greater clarity would be beneficial on which allocations, if any, are intended to contribute to the New Towns programme and how this has been reflected, or will be reflected, within the transport evidence base.

Strategic growth and locations of SRN sensitivity

The Plan proposes a balanced growth strategy, including urban intensification, strategic city extensions and brownfield redevelopment. A number of strategic allocations are located close to SRN corridors and junctions, including the M1 at Junctions 13 and 14, the A421 corridor including approaches to Fen Roundabout, and the A5 corridor including junctions such as Kelly's Kitchen Roundabout.

For SRN purposes, the allocations of most direct relevance include, amongst others:

- *Eastern Strategic City Extension (GS14), adjacent to the M1 corridor between Junctions 13 and 14 and close to the A421 and M1 Junction 13 interface*
- *Milton Keynes East Strategic Urban Extension (GS21), close to M1 Junction 14 and generating mixed use demand, including employment related trips*
- *Central Milton Keynes (CMK1 and GS2), a significant quantum of development with potential pressure on the A5 and associated junctions*
- *South Caldecotte (GS23), a strategic employment allocation with likely high HGV activity and implications for the A5 corridor*

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- *Southern A5 corridor allocations, including GS17 and GS18, contributing cumulatively to A5 junction pressures, including constrained single carriageway sections to the south*

These locations form the focus of National Highways' assessment of cumulative impacts on the SRN set out in the sections below.

Housing

The housing trajectory set out in Annex A of the MK City Plan 2050 forecasts the delivery of approximately 59,779 dwellings by 2050 within the plan area. This includes both existing commitments and new strategic allocations and represents a significant scale of growth with implications for the SRN.

When considered cumulatively, the scale and distribution of housing growth proposed in the Plan has the potential to materially increase demand on the SRN and reduce operational resilience, particularly where growth is concentrated around key corridors and junctions identified above.

The Plan's existing requirement for Transport Assessments and Travel Plans for developments with significant transport impacts, including paragraph 83 and Policy GS10, is welcomed. However, National Highways considers that this requirement should be strengthened to explicitly secure cumulative impact assessment across strategic growth areas, with mitigation measures clearly linked to phasing and delivery triggers. This would provide greater certainty that SRN performance and safety are maintained as growth comes forward.

At present, there is insufficient plan level evidence to demonstrate that the cumulative impacts arising from the proposed housing growth can be safely and efficiently accommodated on the SRN, or that appropriate mitigation can be delivered in step with the housing trajectory.

Employment and Freight

The MK City Plan 2050 identifies a forecast demand of 433 hectares of employment land by 2050, including a substantial requirement for warehousing and logistics uses. This scale of employment growth has the potential to generate significant additional freight movements and commuter trips on the SRN.

When considered cumulatively with strategic housing growth and committed development, the employment land strategy gives rise to a material risk to the operation and resilience of the SRN, particularly along the M1, A5 and A421 corridors.

The Plan notes a significant shortfall between forecast employment land demand and available supply, particularly for warehousing uses. If suitable sites cannot be delivered within Milton Keynes, there is a risk that unmet demand will result in cross boundary development and increased traffic movements on SRN corridors.

Managing these impacts will require a plan led approach, supported by strategic modelling, freight routing strategies, junction capacity assessment and early collaboration through framework master planning. Reliance on application stage Transport Assessments alone does not provide sufficient confidence that cumulative impacts can be effectively mitigated.

Policy support for overnight HGV parking is welcomed in principle. Early identification and delivery of suitable facilities will be important to manage safety and operational risks on the SRN.

Strategic transport modelling and model outputs

This section summarises the outputs of the Milton Keynes Multi Modal Model as documented in the Milton Keynes City Plan Forecasting Report prepared for Milton Keynes City Council by AECOM in November 2025.

Model alignment with the City Plan

The strategic modelling is based on growth assumptions provided by Milton Keynes City Council which do not fully align with the MK City Plan 2050. Housing inputs within the model range from approximately 31,000 to 34,000 dwellings, which is materially lower than the 59,779 homes identified in the Plan. Employment assumptions within the model are slightly higher than those set out in the Plan.

While the modelling provides a useful high-level indication of where pressures on the network are likely to arise, it does not provide a reliable basis for assessing the cumulative impacts of the Plan on the SRN for the following reasons:

- the quantum of housing tested is materially lower than the Plan trajectory
- known errors within the base model are currently being rectified and the base has not yet been agreed
- the full set of IDP interventions has not been represented within the tested scenarios

- the modelling is limited to a strategic assessment and does not provide junction level operational outputs

On this basis, National Highways cannot rely on the current modelling to demonstrate Plan deliverability for the SRN.

Summary of forecast impacts

Notwithstanding the limitations outlined above, the model outputs indicate that the scale of growth proposed in the City Plan is likely to result in material increases in traffic flows, journey times and levels of congestion on key SRN corridors, particularly the M1, A5 and A421.

The modelling indicates:

- increased flows on the M1 and A5 across peak periods compared to the 2031 Reference Case
- increased pressure on the A421 corridor, including approaches to Fen Roundabout
- elevated volume to capacity ratios on several SRN links by 2050, with congestion most pronounced around M1 Junction 14 and Fen Roundabout
- significant increases in journey times on SRN routes, particularly on the A421 and A5 corridors in the AM peak

While Priority 1 scenarios including Mass Rapid Transit reduce flows on some corridors, this is achieved through the removal of highway capacity. Priority 2 scenarios reinstate highway capacity but retain high car mode share, resulting in widespread congestion and limited headroom for future growth.

Absence of junction level assessment

The Forecasting Report does not include junction level modelling, queue length outputs or operational performance assessment at individual junctions. Instead, reliance is placed on strategic flow and volume to capacity outputs.

This approach does not provide sufficient information to understand how forecast increases in demand would manifest operationally at constrained or complex junctions on and around the SRN. In particular, volume to capacity ratios alone do not quantify queue lengths, blocking back or safety related risks.

This limitation is critical for locations such as:

- M1 Junctions 13 and 14

- A421 at Fen Roundabout and associated approaches
- A5 corridor junctions including Kelly's Kitchen Roundabout

Without junction level assessment, National Highways is unable to determine the scale or acceptability of impacts, the feasibility of mitigation, or the timing at which mitigation would be required.

Required next steps

National Highways requires that further plan level transport work is undertaken to support the City Plan ahead of Examination. This should include:

- an updated and agreed strategic model reflecting the full housing and employment trajectory set out in the Plan
- representation of relevant IDP interventions within the modelling
- sensitivity testing of committed and reasonably foreseeable development
- targeted junction level assessment at key SRN locations, supported by queue length and operational outputs

National Highways holds a model of M1 Junction 13 which may be suitable to support this work and is open to discussing its use. National Highways is also preparing technical advice on how the Universal Theme Park Special Development Order should be reflected within future modelling. It is also recognised that local junction modelling may also exist as part of ongoing discussions with developments, which could also be suitable to supporting this work.

Until this further work is undertaken, National Highways is unable to conclude that the cumulative impacts of the Plan on the SRN can be safely and efficiently accommodated.

Transport Assessment and Consultation

National Highways recognises that Transport Assessments will be prepared to support individual development proposals coming forward through the City Plan. However, Transport Assessments are inherently site-specific and cannot substitute for plan-level evidence demonstrating that the cumulative impacts of the overall growth strategy can be accommodated on the SRN.

In the absence of a robust strategic evidence base, there is a risk that impacts and mitigation are addressed in a piecemeal manner, leading to uncertainty, delay and potential conflict at the application stage.

Based on the evidence currently available, National Highways is unable to conclude that the cumulative impacts of the City Plan on the SRN can be safely and efficiently accommodated. This reflects a combination of factors, including reliance on an unfinished strategic model, the absence of junction-level analysis, misalignment between modelled growth and the Plan's housing trajectory, and dependence on uncommitted and untested infrastructure interventions. Until these matters are addressed through further plan-level transport work, Transport Assessments alone cannot provide the necessary assurance that growth can be delivered without compromising the safety and performance of the SRN.

National Highways remains committed to working constructively with Milton Keynes City Council to resolve these issues ahead of Examination. Addressing them at plan-making stage would provide greater certainty for all parties, reduce the risk of delay at later stages, and place the Plan on a firmer footing in transport terms.
Notwithstanding the above, National Highways expects that each major development proposal within the MK City Plan area, including strategic housing allocations, employment sites, and mixed-use developments, will be supported by a comprehensive Transport Assessment (TA). These assessments should:

- Quantify the traffic impact of each site, including cumulative effects from other planned developments.
- Assess the implications for the SRN, particularly the M1 (Junctions 13 and 14), A5 corridor, and A421.
- Identify necessary mitigation measures to maintain the safe and efficient operation of the SRN.

National Highways should be consulted at every stage of the planning process for these sites, from early master planning, through to detailed application. This will ensure that transport modelling assumptions are robust, mitigation measures are agreed in principle, and developer contributions are secured by Milton Keynes City Council where required. Early engagement will help avoid delays and ensure that growth is delivered in a way that supports both local and national connectivity.

Mitigation measures, such as signal optimisation, capacity upgrades, and operational strategies, must be secured through phasing and trigger-based obligations to ensure the SRN continues to operate safely and effectively in line with DfT Circular 01/2022.

Infrastructure First Approach and Infrastructure Delivery Plan

The MK City Plan 2050 places strong emphasis on an 'Infrastructure First' approach, with the intention that essential services and facilities are delivered ahead of or alongside new development. Whilst National Highways welcomes this principle, the funding mechanisms

identified within the Plan, including the MK Tariff and Section 106 agreements, are primarily focused on the delivery of local infrastructure.

National Highways considered it essential that any mitigation required to address impacts on the SRN is explicitly identified and secured through these mechanisms where applicable. This should include junction capacity improvements, safety enhancements, and any other interventions necessary to maintain the safe and efficient operation of the SRN as growth comes forward.

Early engagement between MK City Council, developers, and National Highways will be essential to ensure that SRN related infrastructure is properly scoped, costed, and programmed. Securing clarity on delivery responsibilities, funding sources and timing at an early stage will help reduce uncertainty, avoid delays and ensure that the cumulative impacts of housing and employment growth are effectively managed.

The IDP's Infrastructure Project Schedule (Page 259) identifies several interventions relevant to the SRN. The most significant include:

- Capacity improvements at M1 Junction 14
- Upgrades to A5 corridor junctions such as Kelly's Kitchen Roundabout; and
- A new multi-modal crossing over the M1 to support buses, MRT, and active modes.

These interventions are identified as necessary to mitigate cumulative impacts from growth areas such as MK East, Eastern Strategic City Extension, Levante Gate, and South Caldecotte.

In addition to highway capacity improvements, the IDP provides a range of sustainable transport measures intended to reduce car dependency and mitigate pressure on the SRN. These include:

- MRT: A proposed high-capacity public transport network designed to provide fast, reliable connections between growth areas and Central Milton Keynes. MRT is intended to attract trips away from private cars, particularly for commuting and cross-city journeys, thereby reducing demand on the M1, A5, and A421 corridors.
- Active Travel Infrastructure: The IDP sets out plans for significant enhancements to walking and cycling networks, including extensions to the Redway system, improvements to National Cycle Network routes, and new multi-modal crossings over the M1 to accommodate buses, MRT, and active modes. These measures aim to make sustainable travel more viable for shorter trips and improve connectivity to strategic development sites.

- Bus Priority and Demand Management: The IDP references bus priority schemes and integration with MRT corridors, alongside potential demand management measures such as parking strategies. These initiatives are intended to improve the competitiveness of public transport relative to car travel.

If delivered in full and at an early stage, these interventions could have the potential to help manage traffic growth and reduce congestion on the SRN. However, their effectiveness is dependent on timely implementation, integration with land use planning and complementary policies to support mode shift.

At present, funding for both highway and sustainable transport interventions is largely unconfirmed beyond developer contributions, and a number of key schemes are programmed for the medium to long term, while housing and employment growth is expected to come forward earlier in the Plan period. This misalignment presents a risk that SRN impacts will arise before mitigation is in place, with potential implications for network performance and safety.

National Highways recommends that the IDP clearly sets out SRN related projects with defined cost estimates, funding sources, delivery timescales and identified delivery responsibilities. Where appropriate, trigger-based developer contributions should be secured to ensure that mitigation is delivered ahead of, or alongside, growth. Consideration should also be given to alternative funding streams, including the Department for Transport Major Road Network programme, to address funding gaps.

For avoidance of doubt, National Highways will not be the scheme promoter or delivery body for schemes identified within the IDP unless explicitly stated otherwise and previously agreed with National Highways.

While the IDP recognises the need for SRN interventions, the current lack of confirmed funding and the long-term phasing of key projects present risks to network resilience. Early engagement and clear delivery mechanisms will therefore be essential to ensure that cumulative impacts from housing and employment growth do not compromise the safe and efficient operation of the SRN.

The IDP identifies a number of highway interventions that are intended to mitigate the impacts of growth on the SRN; however, these interventions have not been fully reflected within the strategic transport modelling. As a result, the modelling does not test whether the proposed infrastructure is sufficient to address the cumulative impacts of the Plan, nor does it provide confidence on the scale, effectiveness or timing of mitigation.

Crucially, because the strategic transport modelling does not include the full suite of IDP interventions, it is not possible at this stage to identify with confidence what SRN infrastructure is required to support the scale of growth proposed. Furthermore, there are currently no committed National Highways schemes identified for this area, and until the modelling is updated to reflect all relevant IDP schemes and their phasing, National Highways cannot determine the nature, scale or timing of mitigation necessary to ensure the safe and efficient operation of the SRN.

Further work is required to ensure that the full set of relevant IDP interventions is appropriately represented in the modelling and that clear delivery, funding and phasing arrangements are established.

Sustainable Travel

The Transport and Movement Topic Paper places strong emphasis on sustainable travel as a key mechanism to accommodate significant growth without overwhelming the SRN. The strategic modelling demonstrates that mode shift policies and supporting infrastructure investment can influence traffic patterns and reduce pressure on the SRN.

Milton Keynes is currently characterised by a high level of car use. Without intervention, the planned delivery of approximately 59,779 new dwellings and major employment allocations would result in substantial increases in highway trips, with consequent pressure on the SRN, particularly along the M1, including Junctions 13 and 14) and the A5 corridor.

To address this, the Council's transport strategy seeks to deliver a step-change in travel behaviour through a combination of measures. These include:

- The introduction of an MRT system known as MK Metro;
- The reshaping of local bus services;
- The expansion of demand-responsive transport, such as MK Connect; and
- Investment in active travel networks, including the Redway system and micromobility options.

Parking policies and road space allocation will also be adjusted to make sustainable modes more attractive relative to private car use.

The modelling work referenced earlier indicates that these measures have the potential to reduce car dependency and mitigate some of the forecast traffic growth. However, while sustainable travel measures can reduce the scale of SRN impacts, they will not eliminate the need for targeted highway mitigation where capacity and operational issues arise.

National Highways supports the principle of sustainable travel and recognises its potential to reduce cumulative impacts on the SRN. However, it will require clear evidence of mode shift assumptions in Transport Assessments, monitoring frameworks to track delivery and uptake of MRT and active travel, and contingency planning for SRN interventions if sustainable travel targets are not met.

Sustainable travel measures represent an important component of the overall mitigation strategy for the MK City Plan 2050. They offer the potential to delay or reduce the scale of costly SRN upgrades, improve network resilience, and support the delivery of growth in a manner consistent with climate and health objectives. Nevertheless, these benefits will only be realised if the proposed interventions are delivered in full and on time.

Other Supporting Evidence

In addition to the detailed review and recommendations set out above, we acknowledge the wider evidence base that underpins the MK City Plan 2050. This includes a suite of Topic Papers and the Strategic Housing Land Availability Assessment (SHLAA), which collectively provide context for the growth strategy and inform the policies referenced throughout this representation.

The Growth and Infrastructure Topic Paper set out the rationale for the Plans overall housing and employment targets in the Plan, confirming the Local Housing Need figure and setting out the ambition to deliver approximately 59,779 homes by 2050. It also outlines the strategic allocations that form the backbone of the spatial strategy, including major extensions such as the Eastern Strategic City Extension and significant urban intensification within Central Milton Keynes.

Alongside housing, the paper identifies the scale of employment land and floorspace required to support economic growth and reinforces the principle of an “Infrastructure First” approach, which has already been highlighted as critical to managing cumulative impacts on the SRN.

The Central Milton Keynes Topic Paper focuses on the city centre’s role as a mixed-use hub and sets out proposals for delivering new homes, employment space, and cultural facilities in a way that supports placemaking and sustainable movement. It introduces design principles, a tall building strategy, and the concept of a Tech and Innovation Quarter, all of which are referenced in the Local Plan policies reviewed earlier. These proposals are significant because they concentrate growth in highly accessible locations, which aligns with the transport strategy and has implications for SRN demand.

The Transport and Movement Topic Paper provide the policy framework for reducing car dependency and accommodating growth without overwhelming the transport network. It sets out the Council's plans for a Mass Rapid Transit system (MK Metro), restructured bus services, and improvements to active travel infrastructure, alongside measures to manage parking and encourage mode shift. While National Highways has considered the outputs of the multi-modal modelling, the Transport and Movement Topic Paper explains the strategic intent behind those interventions and why they are essential to mitigating traffic impacts on the SRN.

Finally, the Strategic Housing Land Availability Assessment (SHLAA) summarises the capacity and deliverability of sites identified through the Call for Sites and other assessments. It confirms that the proposed allocations are suitable and achievable and includes a windfall allowance to reflect smaller sites likely to come forward during the plan period. The SHLAA also notes constraints on employment land supply, particularly for large-scale warehousing, which has implications for freight movements and cross-boundary pressures on the SRN.

Together, these documents provide the context for the growth assumptions referenced in this representation and reinforce the need for robust transport modelling and mitigation measures. They demonstrate that the scale and distribution of development proposed in the MK City Plan 2050 is evidence-led, but also highlight dependencies, such as the timely delivery of infrastructure, which must be addressed to safeguard the performance and resilience of the SRN.

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.

Based on the evidence currently available, National Highways is unable to conclude that the cumulative impacts of the Plan on the SRN can be safely and efficiently accommodated. This reflects a number of unresolved issues within the transport evidence base which cannot be addressed through application-stage Transport Assessments alone.

National Highways' key positions are set out below:

1. **Reliance on individual Transport Assessments is not sufficient**
   While Transport Assessments and Travel Plans will be required for individual developments, National Highways' position is that they cannot substitute for robust

plan-level evidence. Site-specific TAs are not an appropriate mechanism for resolving strategic and cumulative impacts arising from the overall scale of growth proposed in the Plan, particularly where impacts interact across multiple allocations and affect key SRN junctions.

2. **A Regulation 20 submission is required to address outstanding transport evidence**
   National Highways considers that further work is required prior to Examination and should be presented through a Regulation 20 update. This should include an updated and agreed strategic transport model which reflects the full quantum of planned housing and employment growth set out in the City Plan. National Highways recognises the tight timescales associated with the Local Plan programme and is willing to work proactively with Milton Keynes City Council to agree a proportionate delivery plan and programme to address the transport evidence issues identified, including progressing work in parallel with the Local Plan Examination where appropriate.

3. **The updated modelling must reflect the Infrastructure Delivery Plan**
   The Regulation 20 submission should ensure that relevant SRN-related Infrastructure Delivery Plan interventions are appropriately represented within the modelling. National Highways cannot rely on infrastructure proposals that have not been tested as part of the transport evidence base, nor can it assume that such interventions will be sufficient, deliverable or timely unless their impacts are demonstrated through modelling. This work should also provide clarity on delivery responsibilities, funding sources and phasing to ensure that mitigation can be delivered in step with growth.

4. **Junction-level understanding remains essential**
   Given the forecast increases in traffic flows and volume-to-capacity ratios, further work is required to understand impacts at key junctions on and around the SRN, including M1 Junctions 13 and 14, Fen Roundabout and junctions along the A5 corridor. National Highways advises that junction capacity modelling should be undertaken where increases of 30 vehicles or more are forecast in peak periods, to inform the scale and timing of mitigation.

5. **Cumulative impacts from employment and freight growth must be addressed**
   The scale and nature of employment growth proposed in the Plan, particularly warehousing and logistics uses, has the potential to generate significant additional freight movements. These impacts must be considered cumulatively with housing growth and reflected within the strategic modelling, rather than addressed solely through individual development proposals.

6. **Universal Theme Park SDO should be considered as part of cumulative assessment**
   The recently consented Universal Theme Park Special Development Order represents a committed and reasonably foreseeable development with the potential to materially affect traffic conditions on the A421 and M1 corridors. National Highways' position is that a scenario or sensitivity test incorporating this development should be undertaken as part of the strategic assessment. National Highways recognises that this work may not be completed prior to March; 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. 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.

7. **Sustainable travel supports, but does not replace, SRN mitigation**
   National Highways supports the Plan's ambition to promote sustainable travel and recognises its potential to reduce pressure on the SRN. However, sustainable travel measures cannot remove the need for targeted SRN mitigation where capacity and operational constraints arise, and must be supported by clear evidence, monitoring and contingency arrangements.

8. **National Highways is willing to support further technical work**
   National Highways is willing 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.

In summary, National Highways considers that further plan-level transport work is required before the Plan can demonstrate that cumulative impacts on the SRN have been adequately assessed and mitigated. Addressing these matters through a Regulation 20 update would place the Plan on a firmer footing, reduce risk at Examination, and provide greater certainty for all parties as growth comes forward.

National Highways would like to continue working closely with MKCC with the aim of resolving these issues, ideally prior to examination through a Regulation 20 submission. National Highways is committed to continue to work with you in a collaborative and constructive manor to support the progression of the plan.

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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 [redacted]

Yours sincerely,

[redacted]

Matt Lewis
[redacted]

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