

Name of the Local Plan to which this representation relates:

Milton Keynes City Plan 2050

Please return by **5.30pm** on **Monday 22nd December 2025** to Development Plans, Milton Keynes City Council, Civic, 1 Saxon Gate East, Milton Keynes MK9 3EJ, or via email at ncp.engagement@milton-keynes.gov.uk

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

Jennifer

Last Name

Smith

Job Title
(where relevant)

Director

Organisation
(where relevant)

YMCA Milton Keynes and Northampton

Smith Jenkins Planning & Heritage

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code



Telephone Number

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? – General comments

Paragraph Policy Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Policy HQH2 fails to identify that other forms of accommodation might come forward as 'exception' sites within the City Boundary, and requires an unrealistic level of evidence where sites are proposing more than 50% affordable housing in a single location. The level of evidence required is disproportionate, especially given the evidence base that supports the local plan that there is an on-going need for affordable housing for different groups.

(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.

To remove Section C from the policy in its entirety. Other policies in the Plan (eg H4H4 do not require this evidence, even where it is likely that the type of accommodation proposed will be provided as 100% affordable housing).

There is no requirement in the Framework to provide site specific housing need assessments, specifically for a windfall site in the urban area.

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

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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We only wish to participate if the Council are proposing to amend (specifically to delete) this policy from the Plan.

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Sharing your personal details

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Milton Keynes City Plan 2050
Proposed Submission Stage Representation Form

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(For official use only)

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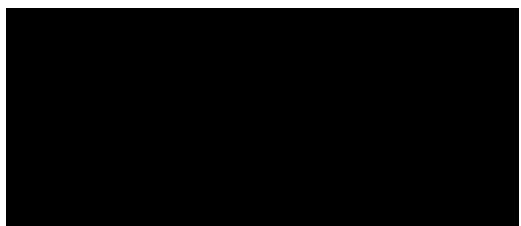
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Policy HQH4, Homes for Co-Living, is too narrow in its focus. It should allow for more complex types of co-living to meet the needs of young people, and specifically care leavers, who are under-represented in the Plan production. The Policy should also make provision for this type of specialist accommodation in the expansion areas, in the same way other specialist accommodation is required. The policy also does not recognise that this type of accommodation, such as the YMCA campus, is developed by a registered provider, and therefore will be 100% affordable housing. In which case, there is a conflict between this policy and HQH2, Affordable Homes.

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

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Proposed revised wording for the Plan is set out below (new addition for Part B of Policy HQH4). This aligns the provision of co-living housing (particularly specialist accommodation for young people) with other types of specialist accommodation within the local plan, and aligns with Paragraph 63 of the NPPF:

A. Development proposals for homes for co-living will be supported where they:

1. Are within the existing development boundary of a settlement;
2. Are in ~~highly~~ accessible locations by public transport, walking and cycling to community facilities in line with Policy GS4;
3. Positively integrate with the surrounding area;
4. Create or maintain a mixed and balanced community within the wider neighbourhood and do not result in an over-concentration of that type of home in that location; and
5. Would not, on their own or cumulatively with other similar developments in the area, result in significant adverse impact on the amenity of residents and/or local communities.

Providing Co-Living Homes in allocations

B. Homes for co-living, specifically providing housing for young people, will be sought as an integral part of strategic housing allocations outlined in Policies GS2 and GS14–19. Where on-site provision is not feasible, financial contributions will be sought to enable provision of affordable homes for young people.

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

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22nd December 2025

Development Plans,
Milton Keynes City Council,
Civic, 1 Saxon Gate East,
Milton Keynes
MK9 3EJ

By email: ncp.engagement@milton-keynes.gov.uk

Dear Sir,

MK CITY PLAN 2050 (Regulation 19)
On behalf of YMCA Milton Keynes and Northampton

I write on behalf of Smith Jenkins' client, YMCA Milton Keynes and Northampton, in response to the Regulation 19 publication of the MK City Plan (2050). These representations have been written on behalf of Simon Green, CEO, and 'we' refers to the YMCA in this context.

The YMCA Milton Keynes has a dedicated facility located in CMK for the provision of 206 bedrooms for young people aged between 18 and 35 who are vulnerable, and either homeless or facing homelessness. In addition we have 38 'moving on' units located within Whitehouse, Milton Keynes, for young people who have been resident with the YMCA in CMK but continue to require supported or subsidised homes.

We provide staged accommodation to meet the needs of young people, alongside support for education, training and employment. We are one of the few organisations in Milton Keynes providing an integrated approach to youth accommodation such that we have a unique perspective on the situation facing young people in the City of Milton Keynes.

The YMCA Milton Keynes is a registered charity. We are also a Registered Provider, with many of our young people receiving housing benefit such that our supported accommodation is classed as social rent/affordable rented accommodation.

YMCA welcome the provisions for additional homes within the City Plan, and the ambition for growth, both within CMK but also across the wider city. Providing more homes, and particularly affordable housing, provides a greater choice and opportunity for younger people across the City. We support the Plan objectives around providing a range of homes to meet those most in need and supporting the delivery of social infrastructure to enable people to prosper and have a high quality of life.

We agree with the statement in the High Quality Homes Topic Paper that the high cost of homes in Milton Keynes is a key challenge. The topic paper also acknowledges that there is a high rate of households in temporary accommodation compared with both the South East and England as a whole (Paragraph 4.12). There is however no discussion within the topic paper (or the Plan) of homelessness,

including the causes of homelessness, which is disappointing. There is also no discussion within the Plan concerning the provision of housing specifically for care leavers, despite the acknowledgement of this in the Topic Paper (Paragraph 4.39).

We note that the Council are promoting the use of large-scale purpose-built shared living homes of at least 50 private individual rooms to accommodate single person housing (Policy HQH4, Homes for co-living). However, we consider that this interpretation of co-living in the context of the work that the YMCA is undertaking, and in view of the identified need, is too narrow a model. The definition of shared living needs to be more flexible to allow for different types of accommodation to meet the varied needs of young people. As the High Quality Homes Topic Paper correctly sets out, what counts as suitable accommodation for young people will depend on individual circumstances (Paragraph 4.39).

Taking the YMCA building in CMK as an excellent example of meeting the needs of young people, this provides three different types of accommodation within a single building: single rooms with shared facilities including shared kitchens; studio accommodation with private bathrooms and one bedroom flats, but who also with access to some communal facilities. This model of providing a variety of facilities within one building enables young people to move within a single location, and meet their needs based on individual circumstances which can also change over time. There needs to be sufficient flexibility within the policy, and the policy should allow for the operator to demonstrate the requirement for the accommodation type, removing the more prescriptive wording in the Plan.

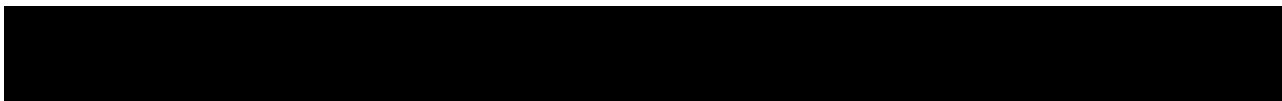
There is a direct conflict between Policy HQH4 and HQH2 Affordable Homes. Part C of HQH2 states that other than on exception sites, proposals resulting in the creation of more than 50% affordable homes will only be permitted in specific circumstances and must be evidenced using an up to date needs assessment demonstrating a need for that development in that location. Using the traditional methodology of a housing needs assessment, it is difficult to assess need within an estate or residential area in Milton Keynes. The housing market is such that it is not limited to one grid square, and the this leads to an expensive exercise in undertaking a need assessment across a broad geographic area.

Equally, it is likely that a co-living scheme such as YMCA accommodation will be provided by a Registered Provider such that it will exceed the 50% threshold for affordable housing development on a single site. The YMCA know there is an identified need for this type of accommodation. The YMCA building CMK is 99% occupied. We continue to experience demand for our housing services that far outstrips our available supply, to the extent that we don't even keep a waiting list because it would be too long and unmanageable. We operate a dynamic letting policy where those most actively seeking accommodation at any time are allocated properties as they become available.

The situation is getting worse as Milton Keynes grows, but property available to young people doesn't grow at the same rate. Young people are rarely eligible for social housing, and often cannot afford the high rents and deposits for private accommodation on entry level salaries.

Moving on from our campus is incredibly hard with residents often staying longer than they need, or ideally want to, simply because there isn't anywhere decent and affordable for them to go. This in turn prevents us helping other young people in housing need. We believe Milton Keynes needs specific young person focused co-living in many locations across the city.

A further issue, not considered in the Plan, is the ability to provide viable sites for this type of project. The Plan identifies a large number of dwellings within strategic expansion areas. While each of these sites includes areas for self-build, older person and affordable housing, it would be beneficial if land was also identified specifically to meet the needs of younger people in shared living or co-living



housing, such as a purpose built version of the moving on accommodation in Whitehouse. This will improve the choice of accommodation provided to young people, enable them to stay closer to families and support networks, and make balanced and sustainable communities. We would request an amendment to Policy HQH4 to make this provision (see below).

Policy Amendments

We suggest the following amendments to Policy HQH4 Homes for co-living:

A. Development proposals for homes for co-living will be supported where they:

- 1. Are within the existing development boundary of a settlement;*
- 2. Are in ~~highly~~ accessible locations by public transport, walking and cycling to community facilities in line with Policy GS4;*
- 3. Positively integrate with the surrounding area;*
- 4. Create or maintain a mixed and balanced community within the wider neighbourhood and do not result in an over-concentration of that type of home in that location; and*
- 5. Would not, on their own or cumulatively with other similar developments in the area, result in significant adverse impact on the amenity of residents and/or local communities.*

Providing co-living homes in allocations

B. Homes for co-living, specifically providing housing for young people, will be sought as an integral part of strategic housing allocations outlined in Policies GS2 and GS14–19. Where on-site provision is not feasible, financial contributions will be sought to enable provision of affordable homes for young people.

We suggest the following amendments to Policy HQH2 Affordable Homes:

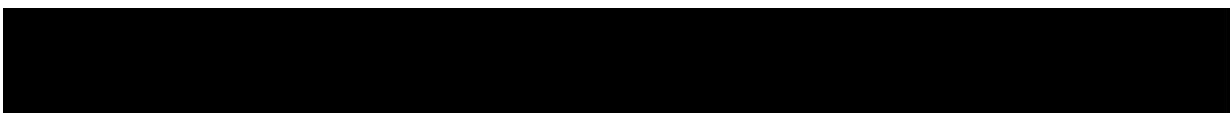
Deletion of Section C in its entirety.

Section C deters the development of exception sites other than in accordance with Policy HQH8, and fails to recognise that development of 100% affordable housing sites can come forward within the city boundary. In these instances, it is unrealistic that an up to date housing needs assessment can be completed due to the potential to identify a specific housing market area. The need is likely to be City-wide.

Conclusion

The YMCA plays an important role in providing accommodation for young people within Milton Keynes. Our comments are intended to ensure that growth in this important area is not prejudiced through choices made and that flexibility in the application of planning policies enables more housing to come forward to support this important group in providing much needed housing.

We wish to participate in any discussion held during the Local Plan Examination in respect of specialist and supported housing.



Yours sincerely



Jennifer Smith MRTPI
Director
Smith Jenkins Ltd

