

Briefing

Forecast for Accessible Homes 2020

Purpose	This briefing analyses accessible housing policies across all 324 local plans in England. We report on our 2020 findings comparing these with the findings in our Insight report: <i>A forecast for accessible homes</i> published in 2019.
For whom	Local councillors, planning teams, parliamentarians, access consultants, developers and the Ministry of Housing Communities and Local Government
Date	January 2021

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Acknowledgements

With thanks to Kai Safdar and Isabelle Standen for research support.

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Foreword

The unprecedented events of 2020 have given many of us pause for thought about what our homes mean to us and how they support our daily life and wellbeing.



Baroness Celia Thomas
CBE

There is a renewed appreciation for form and function, the importance of outdoor space, a space to work and room for some personal privacy. Yet for many disabled people the experience of lockdown was made even more difficult due to the inaccessibility of their homes.ⁱ For others it was a chance to invite the non-disabled world to appreciate their daily experience, in which getting out and about can be severely restricted, not because of health risks but because of the inherent inaccessibility of ones home and neighbourhood.

Habinteg has been providing and championing accessible homes and neighbourhoods for fifty years and has seen many times the difference that having an accessible home can make to disabled people's lives and wellbeing. From having the opportunity to access the children's rooms to read a bedtime story, to being able to cook a family meal, enjoy the garden and to come and go freely, these daily activities are things that we all value but many take for granted. And not having a home that meets our needs can create tangible disadvantage – for example, disabled people who have their needs for accessible homes met are four times more likely to be in work than those who don't.ⁱⁱ

At the moment, the number of accessible new homes that are built is largely influenced by local planning policies. So for the second year Habinteg has analysed English local plans to create a forecast for accessible homes.

The 2019 Insight report: *A forecast for accessible homes* showed that roughly a third of homes planned for between 2019 and 2030, were specified to meet an accessible housing standard.ⁱⁱⁱ This updated forecast shows that fewer are now expected.

Yet new English Housing Survey data published in 2020 shows that 91% of homes don't provide the four main features to be considered even 'visitable' by a wide range of people including wheelchair users like me. It also indicates that over 400,000 wheelchair users are currently living in homes that are neither adapted nor accessible.^{iv} Knowing this, and that our ageing population will increase demand for accessible homes fast over the coming decades, it is unrealistic to think that providing only one third of our new homes to an accessible standard is in any way adequate.

In September 2020 the Government launched a consultation on raising accessibility standards for all new homes. My response firmly calls for the accessible and adaptable standard to be fixed as the new national regulatory baseline, and for a proportion of all new homes to meet the wheelchair user dwelling standard. This updated forecast helps to make the case for a nationally applied standard, giving many more disabled and older people a greater chance of living in a home that truly meets their needs.

Habinteg is keen to help local authorities deliver accessible homes, so if you're interested in finding out more about this briefing and the support that's available to you please get in touch.

Key terminology

Since October 2015 *Building Regulations Approved document M Volume 1* has provided three technical accessibility standards that can be used in new homes.^v

- 1. M4(1) Category 1:** Visitable dwellings is the mandatory baseline. Whilst it offers some basic accessibility features (i.e door widths and corridors of a size suitable for a range of people including wheelchair users), it fails to guarantee the true visitability and adaptability that many households will need over their lifetimes, for example, level access into the dwelling is not always provided.
- 2. M4(2) Category 2:** Accessible and adaptable dwellings is very similar to the Lifetime Homes Standard, a flexible and adaptable standard offering enhanced access features and benefits to all households over their lifetime and over the lifetime of the home.
- 3. M4(3) Category 3:** Wheelchair user dwellings is broadly equivalent to Habinteg's Wheelchair Housing Design Guide (2nd edition), specifying accommodation to meet the needs of a household that includes a wheelchair user. Within the M4(3) standard two sub-categories are available to specify:
 - **M4(3)a:** wheelchair adaptable (meaning that they meet spacial and layout requirements but may not have been fully fitted and finished to accommodate immediate use by a wheelchair user)
 - **M4(3)b:** wheelchair accessible (meaning that the dwelling is fully ready for occupation by a wheelchair user household).

NB: For the purposes of this report we have reported requirements for M4(3) homes of either type as one measurement.

- **Lifetime Homes:** The Lifetime Homes Standard is a series of sixteen design criteria intended to make homes more easily adaptable for lifetime use at minimal cost.
- **Wheelchair user dwelling standards:** Before 2015 there was no singular wheelchair housing design standard. However, guides and examples of best practice existed such as the Habinteg Wheelchair Housing Design Guide (1st and 2nd edition).
- **The Planning Inspectorate** is responsible for examining local plans and ensuring they are in line with government guidelines. The Planning Inspectorate must approve all plans before they can be adopted.

Key findings 2020



31.5%

Just **31.5%** of new homes are **planned to meet an accessible housing standard** between 2020 and 2030, **down from 34.4%** in our 2019 forecast.

In 2020

25%

of the homes due to be built in England are **specified to the Optional Access standards** set out in Part M4 of building regulations (compared to 22% in 2019).



More than half

of all local plans still make **no requirements for any accessible housing standard**.

- There has been an increase in the number of local plans in England with a policy setting a percentage of new homes to be built to an accessible standard. They now account for 48% (154) of all plans compared to 43% (138) in 2019.
- The number of plans specifying use of the Building regulations M4(2) and M4(3) standards has also increased from 96 in 2019 to 119 in 2020.
- However more than half (170) of all local plans still make no requirements for any accessible housing standard (2019:184).
- More of the homes due to be built in England are specified to the Optional Access standards set out in Part M4 of building regulations (25% in 2020 compared to 22% in 2019).
- However the proportion of homes specified under the older Lifetime Homes Standard has halved from 12% in 2019 to 6% in 2020.
- Overall there has been a slight decrease in the total proportion of new homes required to meet accessible housing standards. Plans indicate that between 2020 and 2030 31.5% of new homes in England will be required to do so, down from 34.4% in our 2019 forecast.
- The proportion of homes due to be suitable for wheelchair users in England has remained broadly similar with the picture outside London improving by 0.5% to reach 1.5% of all homes planned over the next decade.
- The regional variations are still marked. Whilst the South East now includes 15 additional plans specifying use of the Building Regulations M4 standards, in the West Midlands no local plans specify these requirements for new homes due for construction between 2020 and 2030.
- The West Midlands still had no planning requirement to build any homes suitable for wheelchair users.

Policy context

The current picture

Building Regulations Approved Document M4 Categories 2 and 3 are 'optional technical standards'. Planning authorities have the option of setting out in their local plan a requirement for a proportion of new homes to be built to each standard. This requirement is subsequently applied through planning conditions placed on individual developments. To adopt such a policy the authority must provide evidence of need in their area and the plan overall must be viable.

Prior to October 2015 any policy wording in local plans relating to accessible housing would most commonly refer to the Lifetime Homes Standard and the Wheelchair Housing Design Guide. However since the introduction of the optional technical standards for access, English Local Planning Authorities are required to refer only to the Building Regulations (M4) standards in plan making. Effectively, for planning purposes in England, the Lifetime Homes and Wheelchair Housing Design Guide have been superseded.

Since 2015, transitional arrangements have been in place governing any adopted local plan setting requirements for older accessible housing standards such as Lifetime Homes or the Wheelchair Housing Design Guide. These should be "interpreted by reference to the nearest equivalent new national technical standard" – i.e. the M4 optional standards.^{vi} As noted in the 2019 report, this rule is not universally understood or respected and plans using the older standard therefore risk under-delivery of accessible homes.

Homes built under permitted development rights don't need to go through the standard planning approval process and as such are required only to meet mandatory baseline building regulations.

Future possibilities

Since Habinteg published its first *Forecast for accessible homes 2019*, the Government have announced and progressed several initiatives that have the potential to change the policy landscape for delivery of accessible housing.

- The *Planning for the future* White Paper (2020) includes plans to introduce national and local design guides and codes, indicating that certain aspects of new development will be set at a national level with local authorities or neighbourhood planning bodies given the opportunity to devise local design guides and codes to help tailor development for their location.
- From April 2021 the Nationally Described Space Standard will be a requirement for all new homes delivered via Permitted Development this indicates a renewed commitment to housing quality.
- A public consultation entitled *Raising accessibility standards of new homes* ran from 8 September to 1 December 2020. Three of the options set out would establish the accessible and adaptable standard M4(2) as the new regulatory baseline, and one option includes setting a national minimum requirement for new wheelchair accessible homes.
- The Government is working on a disability strategy to be launched in 2021 which will include plans on how to improve housing options for disabled people.

Ian Wheaton a Habinteg tenant in Leeds uses his wheelchair accessible kitchen.



Methodology

Local plans are strategic documents set out by every planning authority describing, among other things, the types of homes that need to be built and where.

Policies that require a proportion of new homes to be built to Building Regulations (Part M4 Volume 1: M4(2) Category 2, or M4(3) Category 3) the 'optional technical standards' must be supported by evidence of need in the planning area. The plan as a whole must be shown to be viable in order to be judged sound by the Planning Inspectorate prior to adoption.

Between July and October 2020 Habinteg assessed all 324 local plans from Local Planning Authorities across England, two more than in 2019. This was because in 2019 Adur & Worthing had a combined plan and in 2020 set out their planning requirements in two individual local plans. An additional local plan was also identified in 2020 for the North West region.^{vii}

The overall approach was to use document search functionality to identify and analyse content relating to planning policies for accessible homes and to use the data to estimate the trajectory for delivery of accessible housing from 2020-2030.^{viii}

Best efforts were used to identify the most recent versions of local plans, and in order to deliver analysis that represents a best case scenario, draft plans as well as adopted plans were included where identified.

Data capture and analysis focused on references to, and requirements set to, deliver homes using either Building Regulations Part M4 Volume 1 M4(2) Category 2 or M4(3) Category 3 – referred to as M4(2) or M4(3) in this report - or the superseded Lifetime Homes Standard and Wheelchair Housing Design standards.

Our calculations established an average annual delivery rate of new homes to estimate how many homes would be delivered by each plan between 2020-2030 (10 years delivery), and of these how many would be delivered to accessible standards if the plan was fully implemented. The calculation used is set out below:

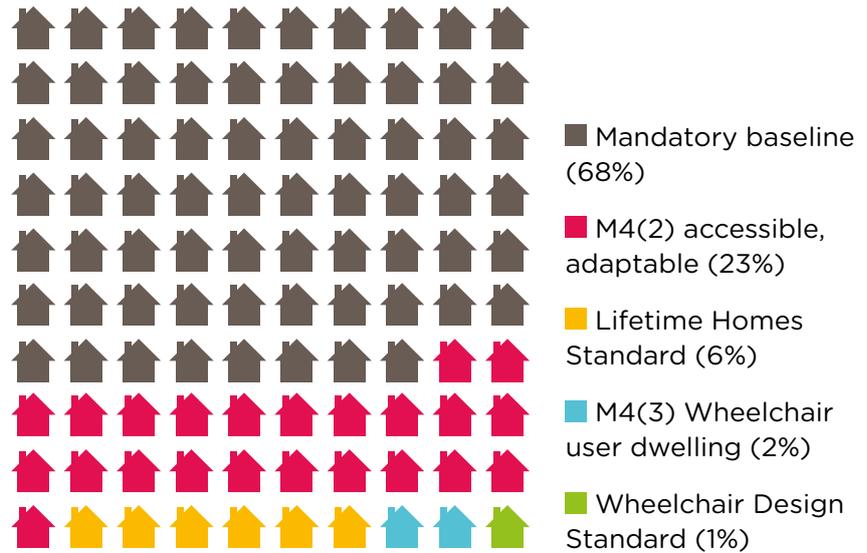
$$\frac{\text{Number of homes due to be built within the plan period}}{\text{Duration of the plan period (Years)}} \times 10 \times \begin{matrix} \% \text{ per access} \\ \text{standard} \\ \text{required by} \\ \text{the plan} \end{matrix} = \begin{matrix} \text{number of homes forecast to be delivered} \\ \text{in that category by 2020-2030} \end{matrix}$$

NB: Between 2020 and 2030 the total number of homes planned for in England is 2,310,194. In 2019 our forecast was based on the total number of homes planned for in the eleven year period 2019-2020 (2,429,380). This update report therefore compares the two sets of results by looking at percentages of total homes planned rather than quantum.

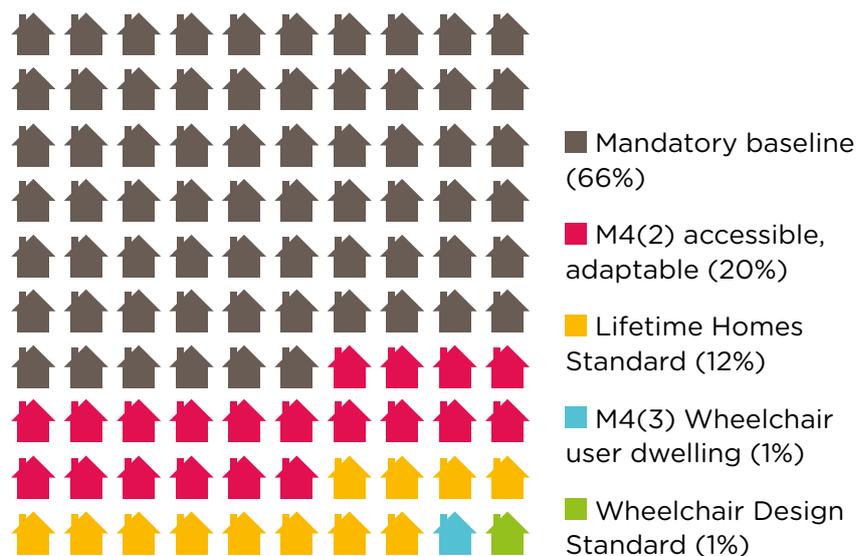
Detailed findings

National picture 2020

2020 Total homes planned to 2030: 2,310,194



2019 (for comparison) Total homes planned to 2030: 2,429,380



Between the 2019 and 2020 forecast

50% 

drop in the proportion of homes planned to the **Lifetime Homes standard**.



Small rise in the proportion of homes set to be **M4(2) standard: from 20% to 23%**.



Slight rise in the proportion of homes set to be **M4(3) wheelchair dwelling standard: from 1.8% to 1.9%**.

Overall drop in the proportion of accessible homes planned

Overall, a smaller proportion of new homes are planned to an accessible housing standard than shown in our 2019 forecast.

The 2020 analysis shows that 31.5% of all homes due to be built in the coming decade are planned to either Building Regulations M4 optional access standards or the older Lifetime Homes or wheelchair housing standards. This is a slightly smaller proportion than reported in our 2019 forecast, when 34.4% of homes were planned to an accessible housing standard.

Between 2020 and 2030 more than two-thirds (68.5%) of all new homes will therefore not be required to meet any accessible housing standard.

The 2015 standards are used less than older standards were

Our 2020 analysis shows a small increase in the number of homes expected to meet M4(2) and M4(3) requirements, but not an equivalent proportion to those previously specified to older standards.

Our analysis found:

- the proportion of homes planned to the Lifetime Homes Standard halved: from 12% (280,914) identified in the 2019 forecast to 6% (140,877) in 2020.
- a small rise in the proportion of homes set to be M4(2) standard: from 20% (495,694) in the 2019 forecast to 23% (530,900) in our updated analysis.
- For homes planned to meet M4(3) wheelchair dwelling standard the proportion also rose very slightly from 1.8% (43,057) in 2019 to 1.9% (44,919) in 2020.

Detailed review of a selection of plans revealed two main drivers for this finding:

- A number of Local Planning Authorities that had previously specified a significant proportion of homes to the Lifetime Homes Standard had produced new plans which do not set the same level of requirement for use of the M4 optional access standards, some of them setting no requirement at all.
- In London we found a 14% drop in the number of homes planned to an accessible standard from 88% in 2019 to 74% in 2020. Although all homes planned in the capital should be built according to London Plan policies that require 90% to M4(2) and 10% to M4(3), a significant number of plans in the Greater London region do not make this specific. For this report, as we did in 2019, we have assessed each local plan on its own content and if no specific percentage was listed, we did not calculate the planned homes as accessible.

Three accessible Habinteg properties in Hull.





29% ↓
of new homes in
**England are planned
to be accessible and
adaptable**, down from
32% in 2019.

Accessible and adaptable M4(2) homes

Taking England as a whole, the impact of the London Plan bolsters the forecast with some 29% (671,381) of all homes specified to M4(2) or Lifetime Homes across the country. This is lower than the 2019 figure when 32% (776,608) of homes were specified to either M4(2) or Lifetime Homes.

	Forecast 2019 (Homes due 2019-2030)		Forecast 2020 (Homes due 2020-2030)	
England as a whole				
Lifetime Homes	12%	(280,914)	6.1%	(140,877)
M4(2)	20%	(495,694)	23%	(530,504)
Total accessible and adaptable	32%	(776,608)	29.1%	(671,381)
Outside London				
Lifetime Homes	7.9%	(159,758)	3%	(51,930)
M4(2)	14.4%	(289,616)	19%	(362,312)
Total accessible and adaptable	21.9%	(449,374)	22%	(414,242)

Outside London, our 2020 analysis found a total of 19% (362,312) of new homes are planned to meet the M4(2) standard. This is a significant rise on the 2019 analysis when 14% (289,616) of homes were set to meet the M4(2) standard. However, if homes specified to the Lifetime Homes Standard are delivered to M4(2) in line with transitional arrangements, a further 3% (51,930) of homes would be built to the accessible adaptable standard, bringing the total in line with our 2019 report at 22%.



Requirements for **wheelchair accessible homes** in England as a whole have stayed broadly similar in the 2020 analysis, at

2.4%

Wheelchair user M4(3) dwellings

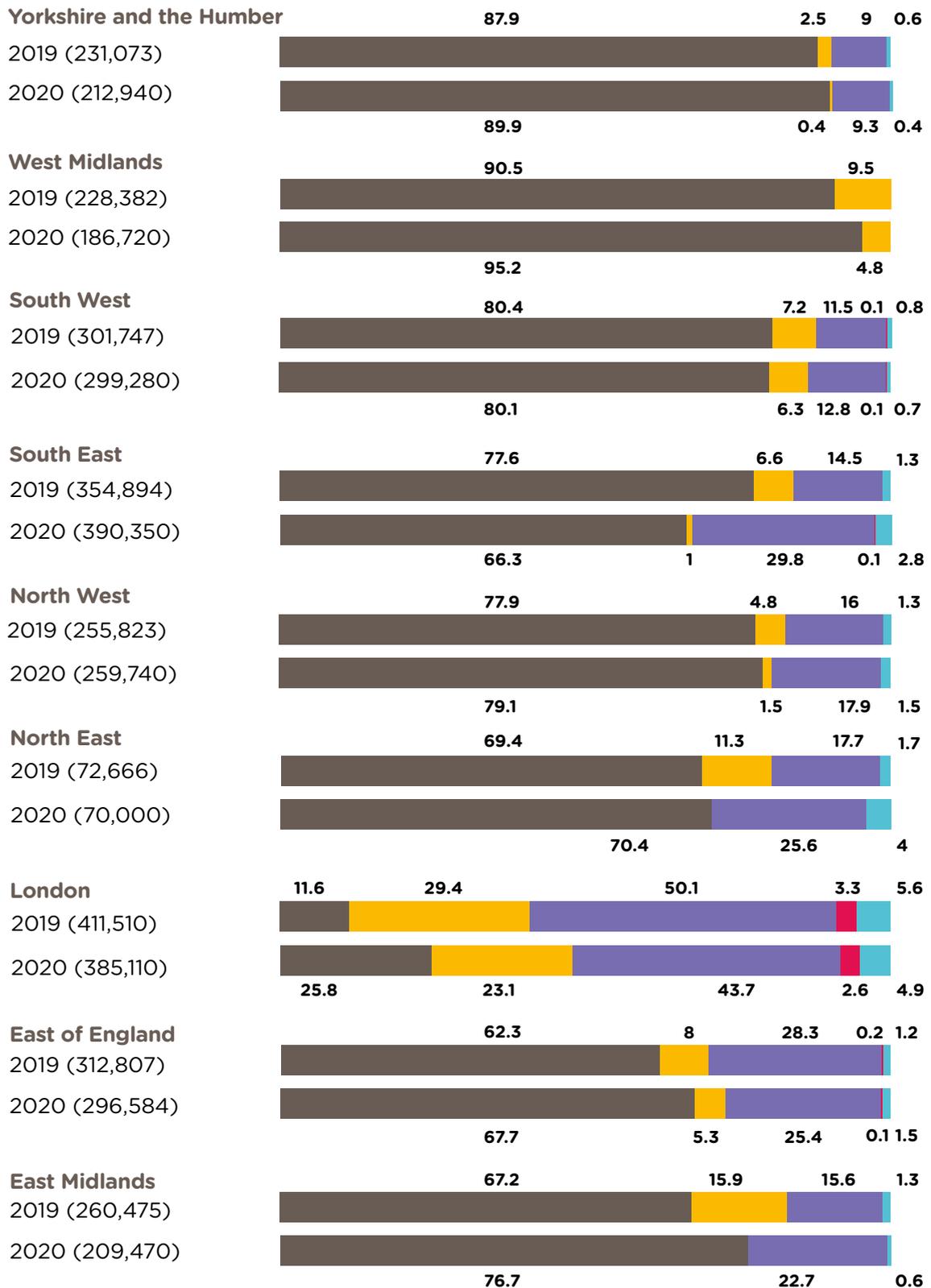
Requirements for wheelchair accessible homes in England as a whole have stayed broadly similar in the 2020 analysis. In 2020 0.5% (10,919) of all homes are planned to the older wheelchair user dwelling standard and 1.8% (44,919) are planned to the 2015 M4(3) standard, staying broadly similar to the 2019 forecast.

	Forecast 2019 (Homes due 2019-2030)		Forecast 2020 (Homes due 2020-2030)	
England as a whole				
Older wheelchair design	0.6%	(14,474)	0.5%	(10,919)
M4(3)	1.8%	(43,057)	1.9%	(44,919)
Total wheelchair standard	2.4%	(57,531)	2.4%	(58,812)
Outside London				
Older wheelchair standards	0.1%	(1,012)	0.1%	(1,036)
M4(3)	1.0%	(20,159)	1.4%	(26,231)
Total wheelchair standard	1.1%	(21,171)	1.5%	(27,267)

Outside London, just 1.4% (26,231) of all new homes are set to meet the accommodation needs of wheelchair users having been specified to meet the M4(3) standard. A further 0.1% (1,036) of homes outside the capital are specified to meet an older wheelchair housing design standard. If these are developed to M4(3) standards in line with transitional arrangements, the total delivery outside London would be 1.5% (27,267) of all planned homes. This is a slight improvement on the 2019 figure when 1.1% (21,171) wheelchair standard homes were planned between 2019-2030.

Types of new homes by region

■ Mandatory baseline %
 ■ Lifetime Homes Standard %
 ■ M4(2) accessible, adaptable %
■ Wheelchair Design Standard %
 ■ M4(3) Wheelchair user dwelling %





In the South East

34%

of all new homes are planned to meet an **accessible housing standard** up from

22%

in 2019.

In London

74%

of homes planned by 2030 are currently governed by **specific policies on accessible housing standards**, down from

88%

in 2019.

Regional variations

The variation in regional forecast is as pronounced in 2020 as it was in the 2019 report.

- In 2020, there are still no plans in the West Midlands requiring homes to meet either of the 2015 optional access standards, although fewer plans (4.8%) require homes to be built to the older Lifetime Homes Standard, compared to 9.5% in 2019. That region still has no planning requirements for wheelchair accessible homes.
- The South East is the region outside London with the highest level of requirement for current M4 optional access standards in 2020. Here 34% of all new homes are planned to meet an accessible housing standard of which 33% are required to M4 optional access standards. This is a notable rise since 2019 when we found that only 22% of new homes in the South East region were planned to meet an accessible housing standard. This finding is partly driven by the inclusion of Milton Keynes in the 2020 analysis. However, the rise in homes planned to meet M4 optional standards is driven predominantly by a further 14 plans setting policies that require a proportion of new homes to meet M4 standards.

Greater London

In 2020 three fewer local plans in London are as specific as they were previously about accessible housing requirements with just 27 of London's 33 plans containing clear statements about their requirements on accessible standards. In both our 2019 and 2020 analysis we have only forecast the projected delivery of new accessible homes where local planning policy clearly states the 90%/10% requirement.

Using this method we found that 74% of homes planned in London by 2030 are currently governed by specific policies on accessible housing standards, down from 88% reported in our 2019 forecast.

Despite this reduction, London still offers the greatest chance of finding a new home of either accessible and adaptable standard or wheelchair dwelling standard, with one new accessible home for every 31 people in the population (2019: 1:24) (see 'Ratio of accessible homes planned per person' map on the next page).

Ratio of accessible homes planned per person, year on year comparison

- Number of accessible homes planned per people in the population.

For example:

In Yorkshire and the Humber one accessible home per 255 people in Yorkshire - down from one accessible home per 195 people in 2019



In England overall there is **one accessible home planned for every 77 people**



1:77

↓ 1:67

35

local plans still refer to older accessible housing standards, putting planning requirements at risk of challenge.

Postcode lottery

In seven of the nine regions, we see a decrease in the ratio of accessible homes planned per head of population. In the South West the chances of finding an accessible home remains the same.

The South East is the only region where we see a significant increase in the chances of finding an accessible new home. Our 2019 forecast demonstrated that there would be one new accessible home built for every 114 people in the population. In 2020 this ratio has increased to one home for every 70 people.

In 2020, the chances of finding an accessible home in the West Midlands became even more slim, with one new accessible home planned between 2020-2030 for every 656 people in the population (worsening more than two fold from the 2019 report).

Overall in England, the 2020 analysis shows that local plans require one new accessible home in the next 10 years for every 77 people in the population, down from our 2019 forecast which calculated the ratio to be one accessible home for every 67 people.

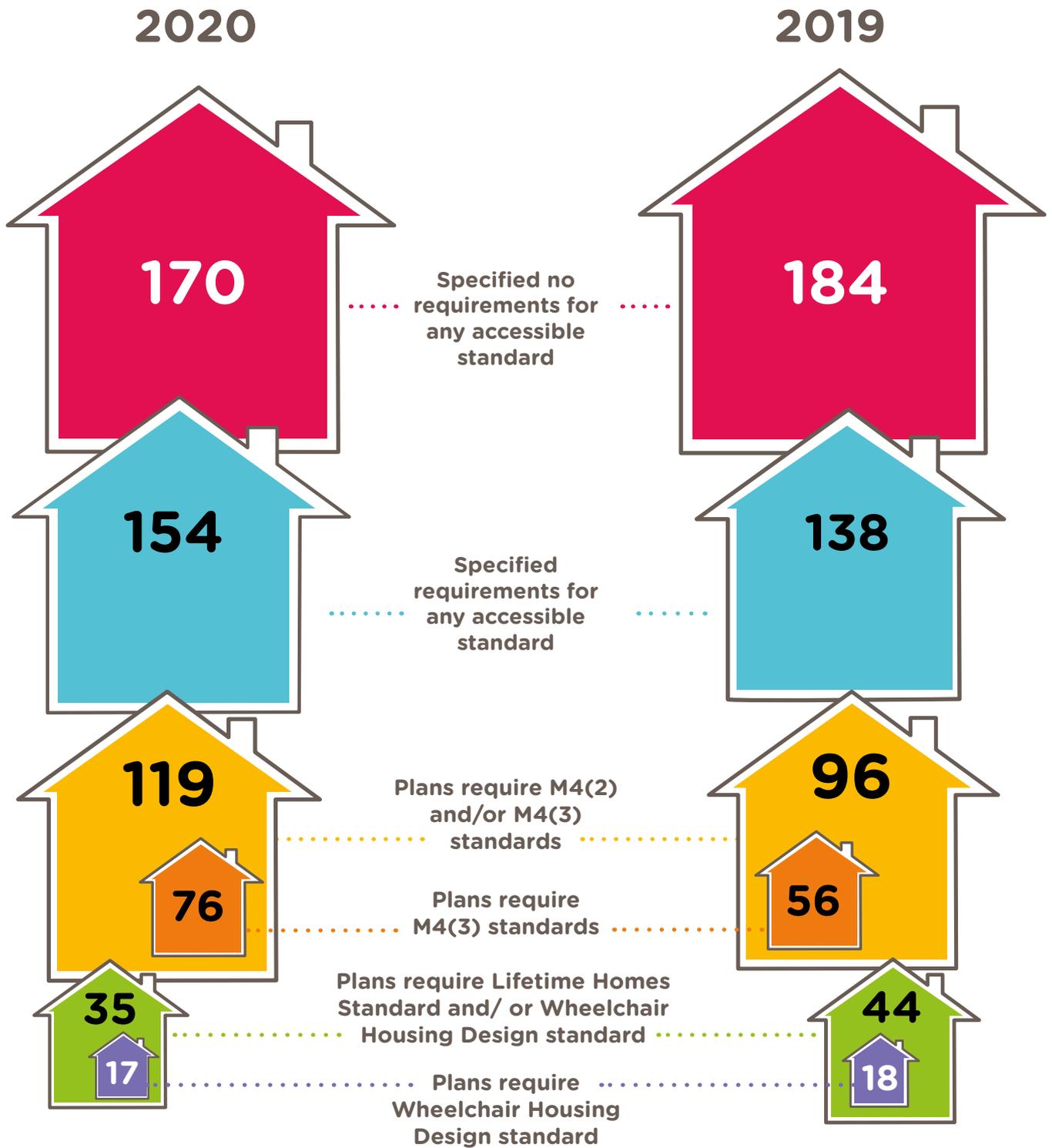
More plans use the 2015 standards

Over a third (119) of local plans analysed in 2020 set out a requirement to use Building Regulations M4(2) or M4(3) standards – the current accessible housing standards designated by government for planning purposes. This is up from 2019 when 96 plans required a specific proportion of new homes to meet these standards.

However the inclusion of policies on accessible homes is far from universal and remains an inadequate response to the true needs of the population.

- Less than half of all English local plans (154) set specific requirements for a percentage of new homes to be built to accessible housing standards despite a small increase from 138 plans in 2019.
- 35 local plans still refer to older accessible housing standards, putting planning requirements at risk of challenge.
- Less than a quarter of plans (76) require any homes to be built to the M4(3) wheelchair user dwelling standard with a further 17 specifying homes to older wheelchair housing standards.

2020 Local plan breakdown



Local plan requirements by region

Yorkshire and the Humber

2019 (21)

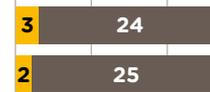
2020 (21)



West Midlands

2019 (27)

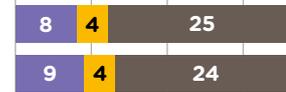
2020 (27)



South West

2019 (37)

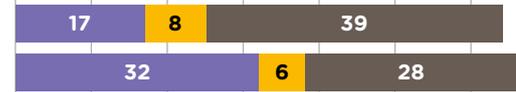
2020 (37)



South East

2019 (64)

2020 (66)



North West

2019 (38)

2020 (39)



North East

2019 (11)

2020 (11)



London

2019 (33)

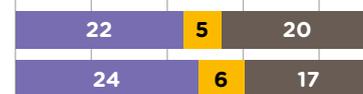
2020 (33)



East of England

2019 (47)

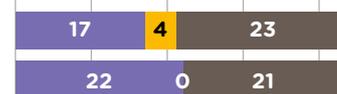
2020 (47)



East Midlands

2019 (44)

2020 (43)



0 10 20 30 40 50 60 70

■ Plans requiring M4(2)/M4(3)

■ Plans requiring Lifetime Homes and Wheelchair Housing Design Standards

■ Plans requiring only mandatory baseline

Outside London, 128 local plans set policy requirements for accessible standards (of either older or current standards). The region with the highest number is the South East where 38 of its 66 local plans require accessibility standards to be delivered in a proportion of new homes. In 2019, 110 plans set policy requirements and the East of England had the highest number of local plans requiring accessibility standards to be delivered in a proportion of new homes.

In 2020, the West Midlands still had no plans that specified homes meet any of the optional 2015 access standards.

The East Midlands becomes the first region in England to no longer require any new homes to meet the Lifetime Homes Standard.



Habinteg Insight group member Tanvi Vyas highlights her favourite accessible home feature for Habinteg's #ForAccessibleHomes campaign

Conclusion and recommendations

The findings of this forecasting exercise show that the proportion of new homes planned to be built to accessible standards in the next decade is smaller than revealed in the 2019 analysis.

This demonstrates clearly that the current system is not having the positive effect on accessible homes supply that was intended. The policy framework, which places responsibility for planning accessible homes with Local Planning Authorities, subject to demands of proof of need and viability, appears to be having a downgrading impact on the number of new accessible homes that are set out in plans. Continuing in this way is not an option if we want to see homes built that will meet the needs of the whole community.

Habinteg are calling for action at both a national and local level.

We are calling on National Government to:

- establish M4(2) as the new regulatory baseline following the consultation on raising accessibility standards for new homes, with the additional requirement to supply a proportion of homes meeting wheelchair user dwellings standard
- set a clear expectation that each Local Planning Authority must plan for a set proportion of new homes to be delivered to wheelchair accessible standards, either through a nationally applicable minimum requirement or a locally devised proportion which must be clearly stated in every iteration of the local plan set out a policy for a proportion of wheelchair accessible properties to be built within each iteration of their local plan
- set a firm expectation that all local authorities maintain a register of the number of people awaiting wheelchair accessible housing in their area along with details of their household profile and preferred tenure
- establish a system for accurately recording the number of new homes built to the M4(2) and M4(3) standards.

We are calling on Local Planning Authorities to:

- be thorough and proactive in planning for the housing needs of older and disabled people, establishing clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards
- to specifically name M4(2) and M4(3) standards in their plans with clear percentages of new homes required in each, regardless of whether a regional strategy or plan indicates an overarching requirement or not.

We are calling on the Planning Inspectorate to:

- challenge any Local Planning Authority if their plan fails to set specific requirements for the delivery of a proportion of all new homes to meet M4(2) Category 2 and M4 (3) Category 3 standards.

Endnotes

- i A snapshot YouGov poll commissioned by Habinteg found that disabled people were three times more likely than non-disabled people to report that the inaccessibility of their home undermined their wellbeing. Habinteg (2020) YouGov Poll key findings <https://www.habinteg.org.uk/download.cfm?doc=docm93jijm4n2734>
- ii Habinteg and Papworth Trust (2016) *The hidden housing market* <https://www.habinteg.org.uk/download.cfm?doc=docm93jijm4n1527>
- iii Habinteg (2019) Insight report: *A forecast for accessible homes* <https://www.habinteg.org.uk/download.cfm?doc=docm93jijm4n2151.pdf&ver=2575>
- iv Habinteg (2020) New government data reveals accessible homes crisis for disabled people <https://www.habinteg.org.uk/latest-news/new-government-data-reveals-accessible-homes-crisis-for-disabled-people-1557/>
- v HM Government (2016) Building Regulations 2010 Access to and use of buildings Volume 1: Dwellings. Gov.UK https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf
- vi HM Government (2015) Written statement to Parliament planning update March 2015. Gov.UK <https://www.gov.uk/government/speeches/planning-update-march-2015> vii Data amendment: During our 2020 analysis, we discovered that Milton Keynes had mistakenly been placed in the East Midlands during our 2019 analysis. This was rectified in our 2020 analysis by moving Milton Keynes to its correct region in the South East.
- viii More detail on methodology can be found in the 2019 Insight report: *A forecast for Accessible homes*.