

Home Energy Conservation Act Progress Report 2017

Milton Keynes Borough Council

Document information

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1 Progress to date

1.1 Introduction

This document summarises the progress made by Milton Keynes Borough Council in relation to the Home Energy Conservation Act¹. The Energy Saving Trust has prepared this progress report in accordance with the Home Energy Conservation Act (HECA) 1995 and the associated guidance which was published on 4th January 2017².

Energy Saving Trust is a leading energy efficiency research and advice consultancy which has been at the forefront of the delivery of energy efficiency policy in the UK for the last 25 years. Our experience of working in the building, energy efficiency, technology and wider climate change sectors means we have the technical, research and economic experience required to deliver successful, energy efficiency strategies, policies and projects. We have an innovative range of services which local authorities, Registered Providers of social housing, businesses and other organisations use to benefit their residents, tenants, employees and customers. In particular, we are highly experienced in delivering reports for local authorities to meet Governmental regulations, and have delivered a number of HECA progress reports both for 2017 and in previous years. We remain independent and we will continue to provide impartial advice based on sound evidence and expertise.

¹ Home Energy Conservation Act. HM Government, 1995

² Guidance to English Energy Conservation Authorities: the Home Energy Conservation Act 1995. BEIS 2017

1.2 Summary

Milton Keynes Borough Council has made significant progress with regards to the energy efficiency of their housing stock over past years.

Large scale redevelopment has taken place, with loft and cavity wall insulation having been installed in homes across the borough. There have been phased regeneration in the Lakes estates, a carbon offset fund has supported carbon reduction activity in the domestic sector, and energy efficiency measures were funded through the Green Deal Together consortium.

Although there have been fewer resources available to Milton Keynes Borough Council to invest in energy efficiency of residential housing in recent years, the Council is still investing in a number of on-going programmes which support energy efficiency, including :

- Housing stock improvement programme for window, boiler and roof repairs.
- Solar PV installations on new build properties, with plans to integrate installations into improvement works in existing properties.
- A free energy efficiency advice service, in partnership with Agility Eco.

To improve the energy efficiency and overall standard of the high number of older, inefficient houses in Milton Keynes, the Council is undertaking a major regeneration project in partnership with Mears (Your MK) which will take place from 2017 to 2030.

1.3 Introduction to HECA

The Home Energy Conservation Act 1995 (HECA) requires local authorities to improve the energy efficiency of all residential accommodation in their areas.

Authorities are expected to consider practical and cost-effective measures that will bring about a significant improvement in the energy efficiency of all types of housing in their areas. The original aim was to achieve a 30% improvement in energy efficiency over 10 years, but this was later extended to 15 years.

From 1997, English authorities were required to submit annual reports showing their progress towards achieving the 30% target. The 12th annual report was produced in 2008 and then the requirement ceased. The independently prepared information submitted by Milton Keynes Borough Council established that the overall energy improvement achieved in the Borough between 1997 and 2008 was 23.9%, and therefore the Council was on target to achieve the 30% improvement in energy efficiency by 31 March 2011.

Following the introduction of new guidance in 2017, which replaces the previous guidance dated 2012, the legal requirement remains for Councils to improve home energy efficiency, and to report on progress. The aim is to make continuous improvements to home energy efficiency to 2027, and Councils are required to publish further reports and action plans every two years which set out the energy conservation measures that the authority considers practicable, cost-effective and likely to result in significant improvement in the energy efficiency of residential accommodation in its area. Reports are required to outline issues such as the local authority's local energy efficiency ambitions and priorities and the steps that the local authority will be taking that take advantage of financial assistance and other benefits offered from central Government initiatives. All the Home Energy Conservation Act reports must be published online, with a link forwarded to the Secretary of State on or before the required date.

1.4 Climate Change and CO₂ Emissions

The Climate Change Act 2008 sets a legally binding national target to reduce CO₂ emissions by 80% by 2050 compared to 1990 levels.

The Act requires the Committee on Climate Change to recommend a series of five-year carbon budgets leading to the 2050 target. In June 2016 the Government accepted the Committee's recommendation for the 5th budget: a limit of 1,765 MtCO₂e over the years 2028-2032, equivalent to an emissions cut of 57% on 1990 levels by 2030.

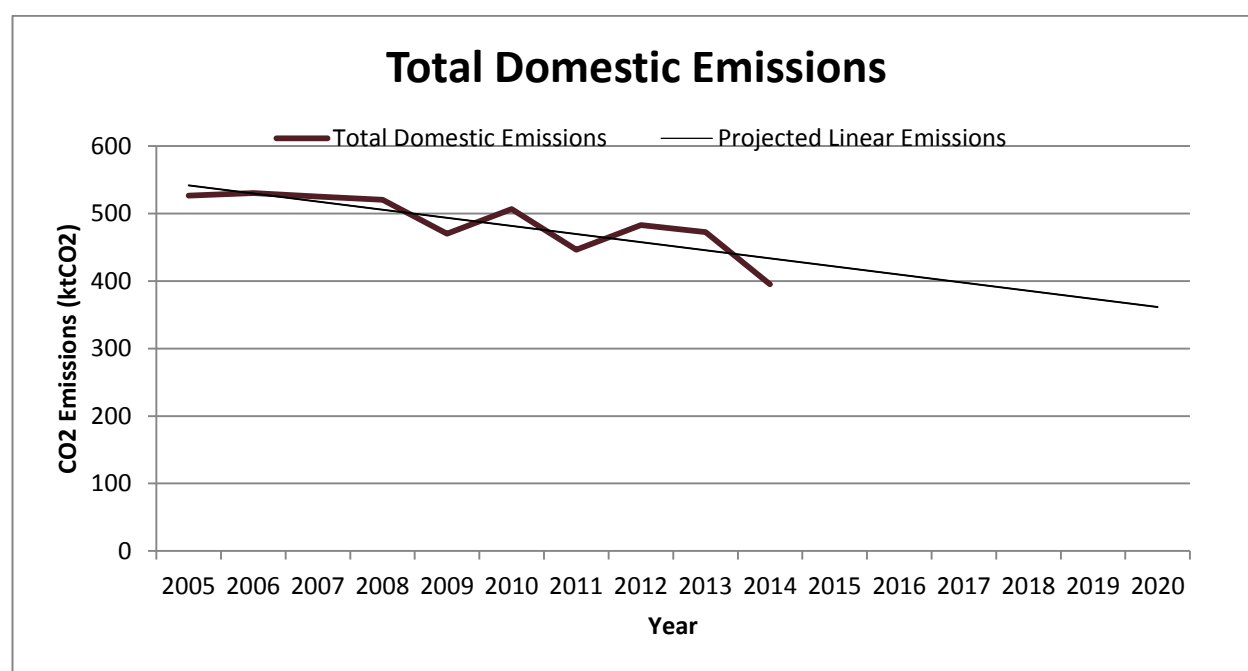
The Government has stated that local authorities are expected to play a major role in meeting these targets through the management of their buildings and vehicle fleets, and in how they influence householders, businesses and transportation in the wider community.

The Milton Keynes 2015 Low Carbon Living Strategy 2015 sets out a new carbon reduction target further to the targets of the previous 2010 Low Carbon Living Strategy. The overall target is for Milton Keynes to reduce carbon emissions by 40% by 2020, from a 2005 baseline and to near zero carbon by 2050.

Figure 1 shows the total annual carbon dioxide (CO₂) emissions from domestic properties in Milton Keynes as calculated by the Department for Business, Energy and Industrial Strategy, for 2005 to 2014. These are the most recent figures available.

Considering the previous 2 years, the figures show that despite a relatively small population increase (approximately 2.7%) the total domestic emissions in Milton Keynes have reduced by 87.7kt CO₂ (18%) since 2012. Similarly, per capita domestic emissions have reduced from 1.9 tonnes to 1.5 tonnes per person (20%).

Figure 1: Domestic emissions for the borough, 2005 to 2014, with 2020 projection



Should the current trend in emissions reduction continue at a similar rate, the projected total domestic emissions in 2020 would be 360kt CO₂ in 2020. However it cannot be assumed that the current rate of improvement will be maintained; simple measures such as cavity wall and loft insulation have been installed in the majority of homes, primarily leaving the harder to treat housing stock still remaining. On-going improvement will therefore require measures with higher capital costs such as solid wall insulation and renewable energy technologies. The Council's capacity to carry out measures to improve the energy efficiency of the housing stock depends on the availability of resources and funding. Additionally, changes in energy consumption can change due to a number of factors, including energy cost changes, changes in economic activity, and seasonal temperature changes, each of these being outside of the Council's control.

1.5 Fuel Poverty

Fuel poverty in England is measured by the Low Income High Costs (LIHC) definition, which considers a household to be in fuel poverty if:

- They have required fuel costs that are above average (the national median level); and
- Were they to spend that amount they would be left with a residual income below the official poverty line.

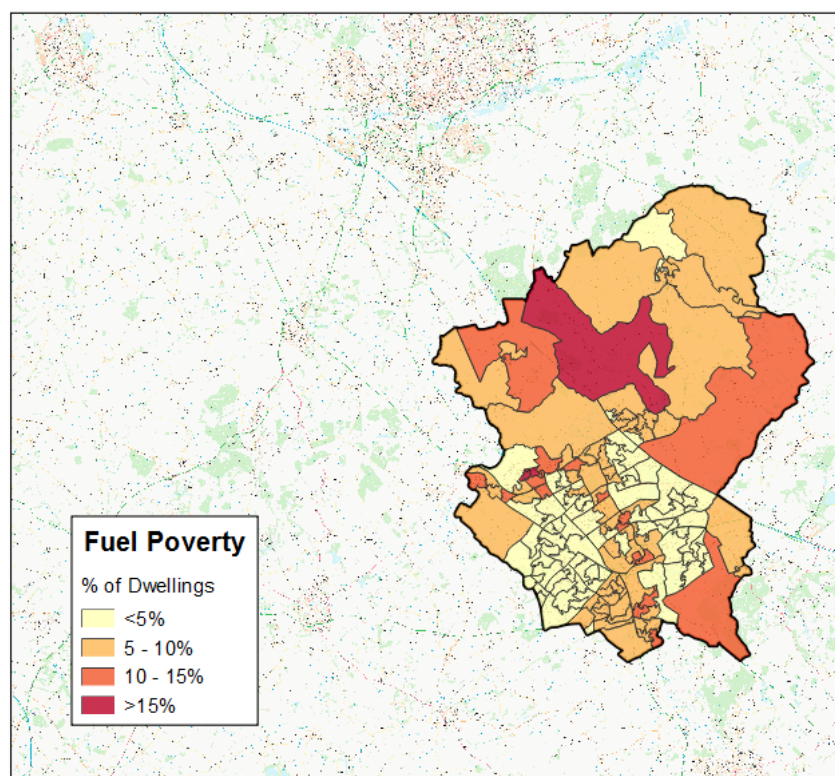
This is different to the previous definition prior to 2013, consequently it is not possible to compare earlier statistics prepared using the different definitions.

The latest figures from the Department of Business Energy and Industrial Strategy (BEIS), published in June 2016, show that there are an estimated 6,500 households in Milton Keynes that are considered to be in fuel poverty. This equates to 6% of total households. This is 4.6% lower than the national average.

Figure 2 shows a spatial analysis of the fuel poverty rates in each LSOA (Lower Layer Super Output Area) in Milton Keynes. The figure is taken from Energy Saving Trust's Home Analytics database. The darker red areas indicate higher rates of fuel poverty; these are the areas in which schemes could be targeted.

Figure 2: Fuel Poverty by LSOA

Milton Keynes Council - Fuel Poverty by LSOA



1.6 Energy Company Obligation

In January 2017 BEIS published its response to its Energy Company Obligation: Help to heat consultation³. As proposed in the consultation, the scheme is moving to focus much more on fuel poverty. The Affordable Warmth Obligation (officially known as Home Heating Cost Reduction Obligation – HHCRO) will now make up 70% of the scheme’s budget and the Carbon Emissions Reduction Obligation (CERO) will make up the remaining 30%. The ECO transition period will run from 1 April 2017 until September 2018 and around £960m will be spend on energy efficiency over that period.

Some of the biggest changes compared to the previous scheme include:

- The increased focus on fuel poverty.
- The greater role for local authorities – they will now be able to determine eligibility for part of the affordable warmth component (more details below).
- The scheme being opened up to poorly insulated social housing properties.
- A relaxing of the eligibility criteria.

1.6.1 Main considerations for local authorities

There are a number of inclusions in the Government’s decision on ECO that impact local authorities and grant a greater role for their involvement in the scheme. Local authorities will be able to determine eligibility for up to 10% of the Affordable Warmth component of ECO (which will make up 70% of ECO), social housing properties rated E, F and G will be eligible to receive measures under Affordable Warmth (although not heating system replacements/repairs) and local authorities will be able to determine non-fuel poor households as eligible for solid wall insulation, where this forms part of a project that delivers solid wall insulation to fuel poor, or low income and vulnerable households.

1.6.2 Flexible eligibility and local authority declarations

Local authorities will now be able to determine eligible homes under the new ‘flexible eligibility’ mechanism. This is primarily aimed at targeting fuel poor households not in receipt of the eligible benefits and low income households that are vulnerable to the effects of living in a cold home. This will be a voluntary mechanism that suppliers can use to meet up to 10% of their Affordable Warmth Obligation. Under this mechanism local authorities would be required to:

1. Publish a ‘statement of intent’ detailing the methodology and criteria they intend to use to identify eligible customers, before they can provide a declaration to suppliers.
2. Issue a declaration to energy suppliers stating that they had determined a household, or a number of households, as eligible under Affordable Warmth (AW), and the reasons for determining them as eligible.

³ Energy Company Obligation (ECO): Help to heat consultation – government response. BEIS, 2017.

As this is an untested process Government has limited it to 10% of AW and intends to monitor quite closely how it is working, including requiring local authorities to produce annual reports on their use of flexible eligibility and collect and maintain evidence on their targeting processes, and participate in the evaluation.

Guidance will be published before the transition period starts (i.e. before April 2017) on whom local authorities should be targeting and the criteria, information to include in declarations, statements of intent and annual reports.

Social housing properties (other than those rated E, F and G – see below) will not be eligible for flexible eligibility.

1.6.3 Solid wall insulation for non-fuel poor households

Under flexible eligibility, local authorities will be able to determine non-fuel poor households as eligible for AW in order to facilitate the installation of solid wall insulation, where this forms part of a project that delivers solid wall insulation to fuel poor, or low income and vulnerable households. The in-filling provision is to make it easier to install solid wall insulation in fuel poor private tenure homes. The in-filling will only apply to SWI and will apply in the following circumstances:

- In private tenure flats, maisonettes, terraces or detached properties next door to each other, as long as at least two thirds of households in any individual project are declared fuel poor, or low income and vulnerable to the effects of living in a cold home (as per local authority declarations above), by the local authority.
- In the case of a pair of semi-detached properties, or in the case of a single building that contains two flats, at least one of the pair must be occupied by a household in fuel poverty or on a low income and vulnerable to the cold.

1.6.4 E, F and G rated social housing properties eligible under affordable warmth

Social housing properties rated E, F and G will be eligible under AW and will not be subject to any of the other eligibility requirements (i.e. being in receipt of eligible benefits). Insulation measures and first time central heating (including renewable heat) or first time district heating will be eligible measures. Boiler and other heating system replacements or repairs (of any fuel type) will not be eligible.

1.7 Housing Stock

The following section shows current information on the housing stock in the local authority area. Figures are from Energy Saving Trust's Home Analytics database which uses a combination of historical energy efficiency installation records along with statistical and geo-spatial models to provide an accurate profile of the housing stock in Great Britain.

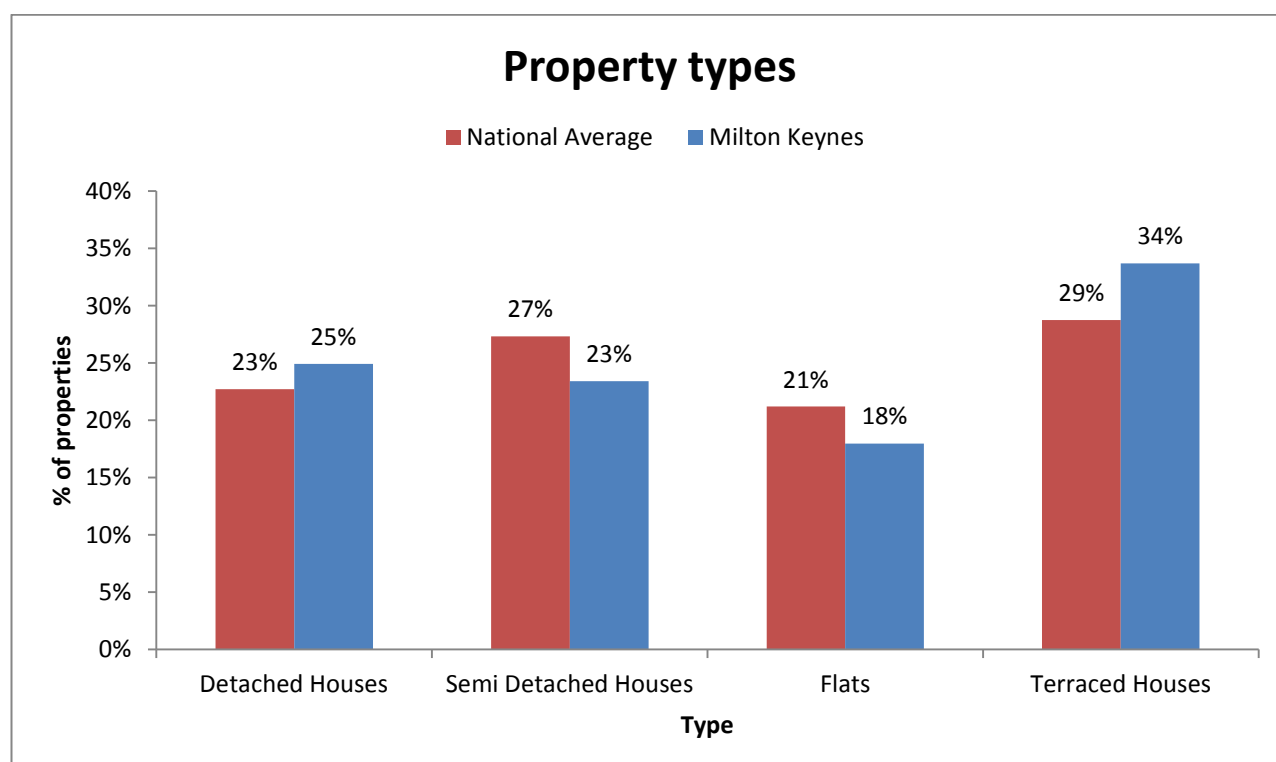
Home Analytics is unique because of the quality of the data that underpins it and the advanced modelling processes used to predict accurate property attributes and energy efficiency information at the address level. This data will help the authority develop strategic, evidence-based planning and market assessment when considering energy efficiency improvements.

Home Analytics models are calibrated wherever possible to verify published sources of data such as the UK Census and national housing surveys. As well as actual data the Home Analytics database includes statistically modelled values and should therefore be treated as a guide rather than an absolute view of the entire housing stock.

1.7.1 Property Type

There are approximately 108,000 households in Milton Keynes⁴. The largest house type in Milton Keynes is terraced houses, these account for a third of Milton Keynes's housing stock; this is 5% more than the national average. Terraced houses are often suitable for large scale or street by street implementation of energy efficiency measures which can provide economies of scale. However single properties can be difficult to treat individually because of planning considerations and the detailing required between properties.

Figure 3: Property types, comparison with national average



⁴ DCLG Household Projections for 2017

1.7.2 Property Tenure

Milton Keynes has a very similar proportion of property tenures to the national average. 68% of the houses are owner occupied; this is around 4% more than the national average. Owner occupied properties have fewer stakeholders involved in the decision to make energy efficiency improvements, compared to rented properties, and can therefore be a relatively easy demographic for targeting improvements towards and offering financial assistance (e.g. homeowner loans).

The Council's housing stock currently consists of approximately 14,500 properties. These consist of around 11,300 fully Council owned properties, and around 1,500 leasehold & shared ownership properties. Local authority properties can be the most suitable for large scale or street by street implementation of energy efficiency improvements given the high level of control that the Council has over their properties. These improvements can provide economies of scale and significant improvements to the overall energy efficiency of housing in the authority.

Figure 4: Property tenure, comparison with national average

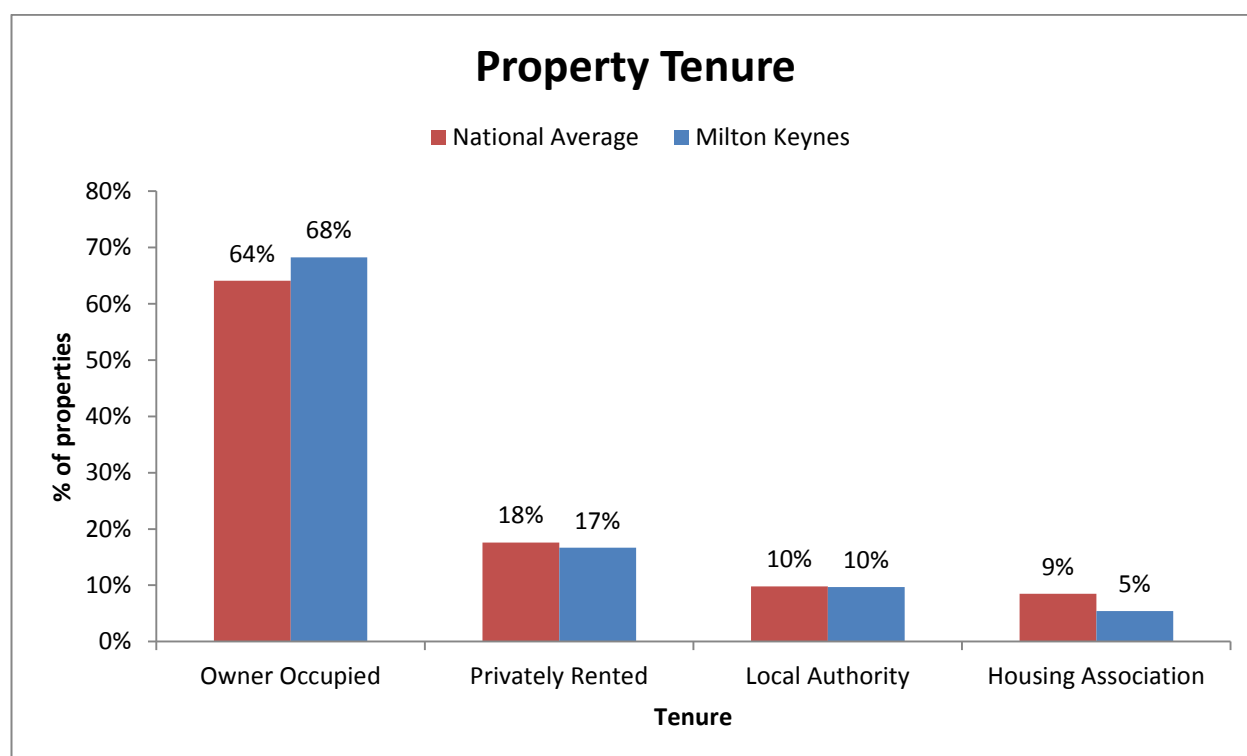


Table 1: Property tenure, private and social housing

Primary Tenure	Secondary Tenure	Proportion (%)
Private	Owner Occupied	68%
	Privately Rented	17%
Social	Local Authority	10%
	Housing Association	5%

1.7.3 Property Age

Milton Keynes has approximately 30% more post-1967 properties than the national average. Properties constructed in this period generally have cavity wall construction. They are less likely to have period features than older properties, which can make energy efficiency retrofits more cost-effective than with older properties.

Figure 5: Property age, comparison with national average

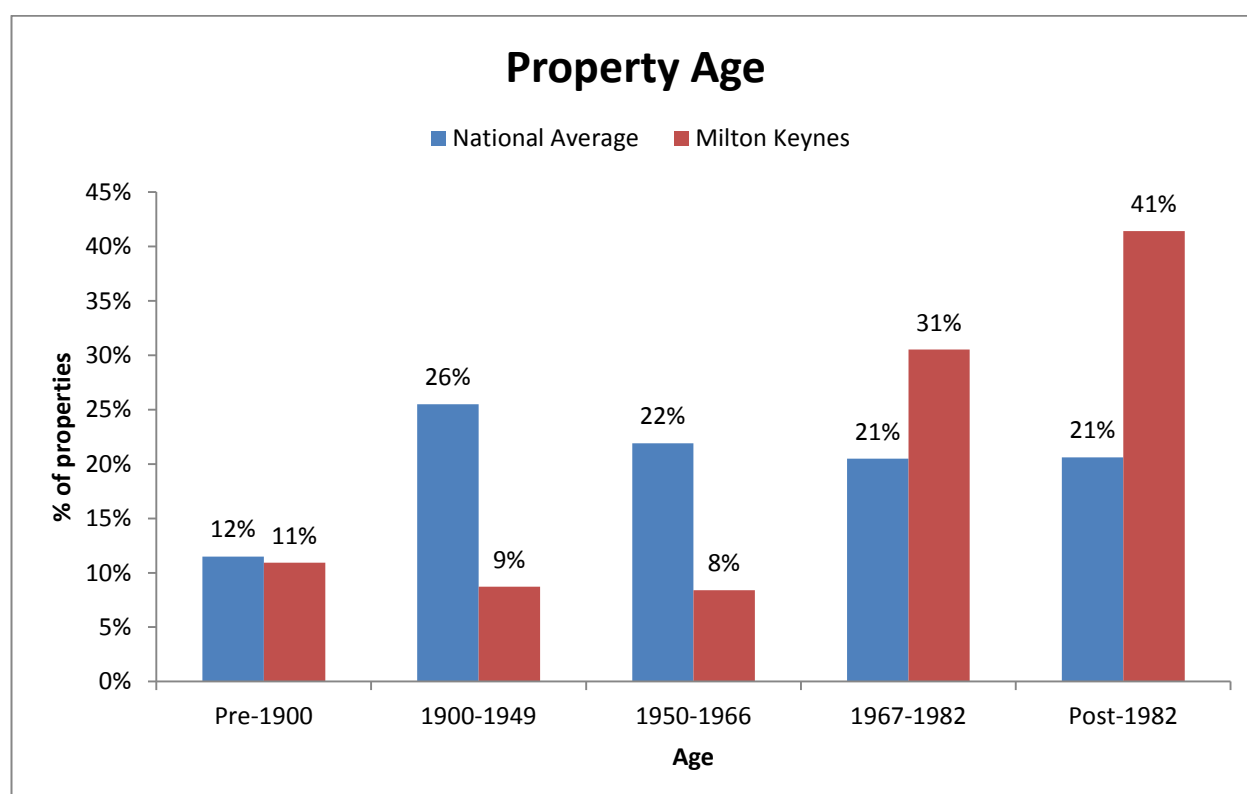


Table 2: Property age

Property Age	Proportion (%)
Pre-1900	11%
1900-1949	9%
1950-1966	8%
1967-1982	31%
Post-1982	41%

1.7.4 Fuel Type

Approximately 90% of Milton Keynes's properties are on the mains gas network. Mains gas is a relatively low carbon and inexpensive fuel. Modern condensing boilers provide high efficiency and low running costs.

There is a significant proportion of electrically heated properties (8.5%). Electric heating is generally the most expensive form of heating and is currently a very carbon intensive fuel. There is the potential to install heat pumps in these properties to improve the efficiency of electric heating systems.

Table 3: Fuel type

Fuel Type	Proportion (%)
Gas	89.9%
Electric	8.5%
Oil	1.3%
LPG	0.3%
Solid Fuel	0.1%

1.7.5 Loft Insulation

Loft insulation is a relatively cheap measure that can provide significant energy bill savings, reducing levels of fuel poverty and carbon emissions. Although the majority (55%) of properties have good levels of loft insulation (over 151mm) there is the potential for a loft insulation scheme to improve levels of loft insulation in the properties in the authority that have the lowest levels of insulation. However these schemes can have diminishing economic returns as the remaining properties are generally harder to treat.

Figure 6: Levels of loft insulation, comparison with national average

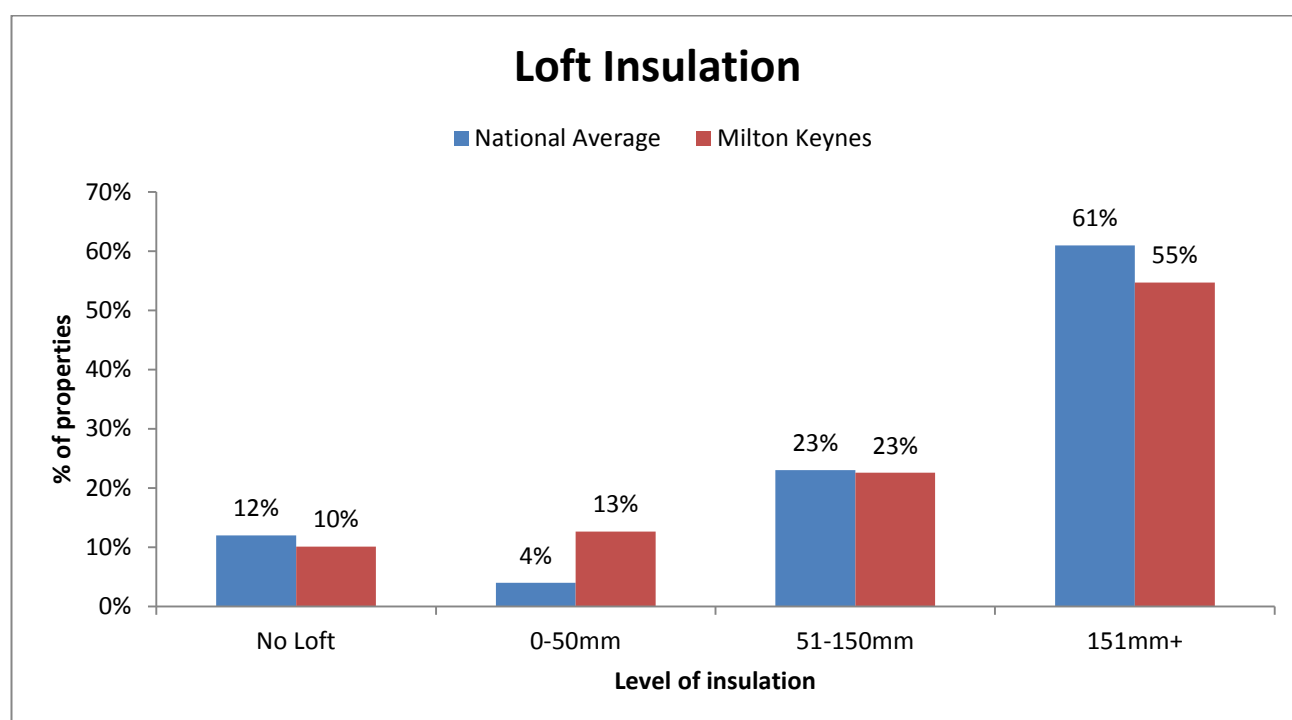


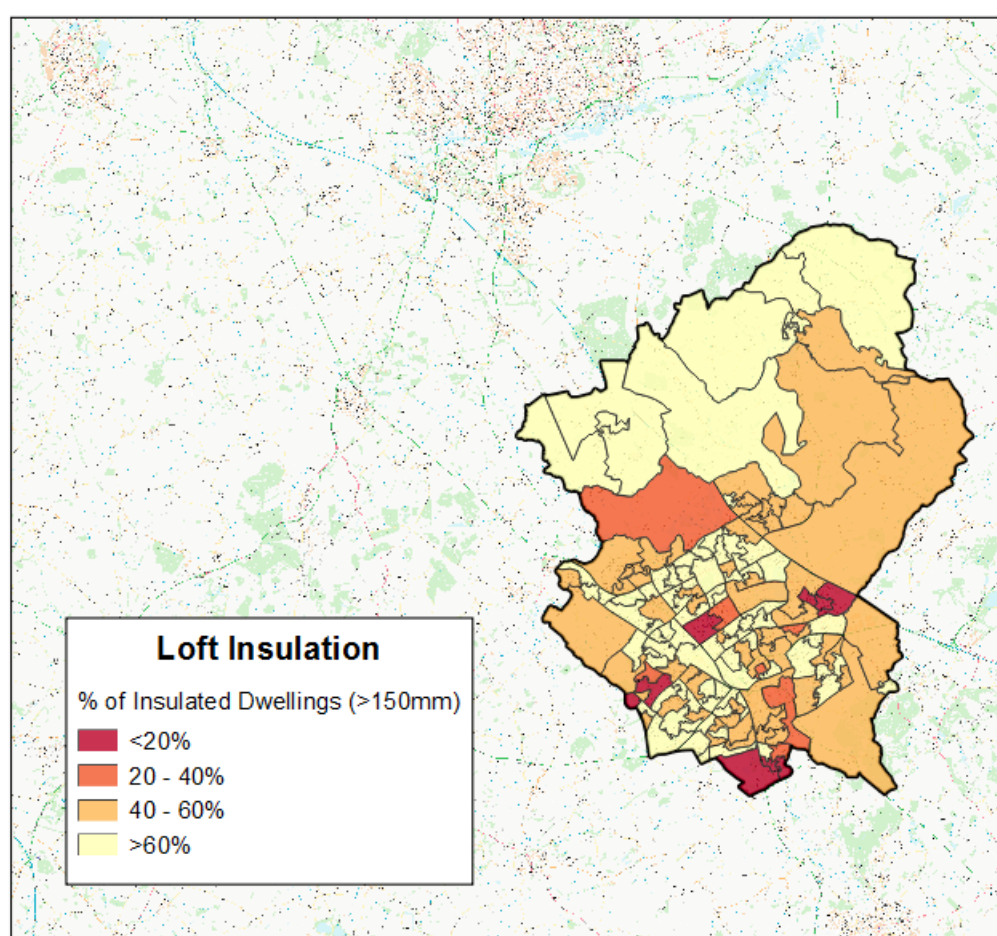
Table 4: Levels of loft insulation

Loft Insulation Thickness	Proportion (%)
No Loft	10%
0-50mm	13%
51-150mm	23%
151mm+	55%

Figure 7 shows a spatial analysis of the proportion of properties with good levels of loft insulation (over 150mm) in Milton Keynes. The figure is taken from Energy Saving Trust's Home Analytics database. The darker red areas indicate areas with lower amounts of insulation. These are the areas in which schemes could be targeted.

Figure 7: Loft insulation by LSOA

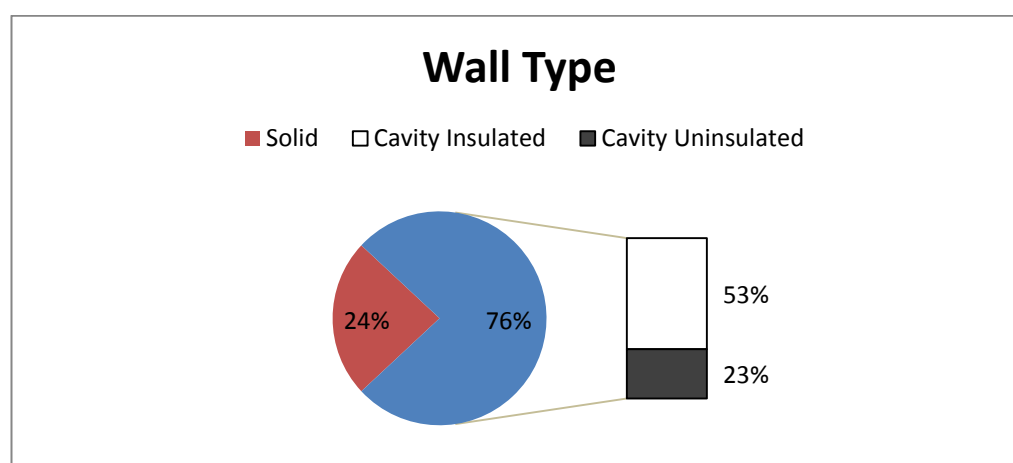
Milton Keynes Council - Loft Insulation by LSOA



1.7.6 Wall insulation

Figure 8 shows the breakdown of wall types and proportion of insulated cavities. Although there are 5% fewer solid wall constructed properties than the national average, it is a significant proportion of the housing stock (24%). Although solid wall properties are more expensive to insulate than cavity walls, this is the main section of the housing stock that remains to be insulated.

Figure 8: Wall type and insulation



Around 76% of Milton Keynes's domestic housing stock is of cavity wall construction. Of the cavity wall properties over two thirds (69%) have been insulated. Compared to solid wall insulation, cavity wall insulation is a relatively inexpensive and easy measure. However the remaining cavity wall properties are likely to consist of harder to treat properties which are more expensive to treat.

Figure 9: Wall types and insulation, comparison with national average

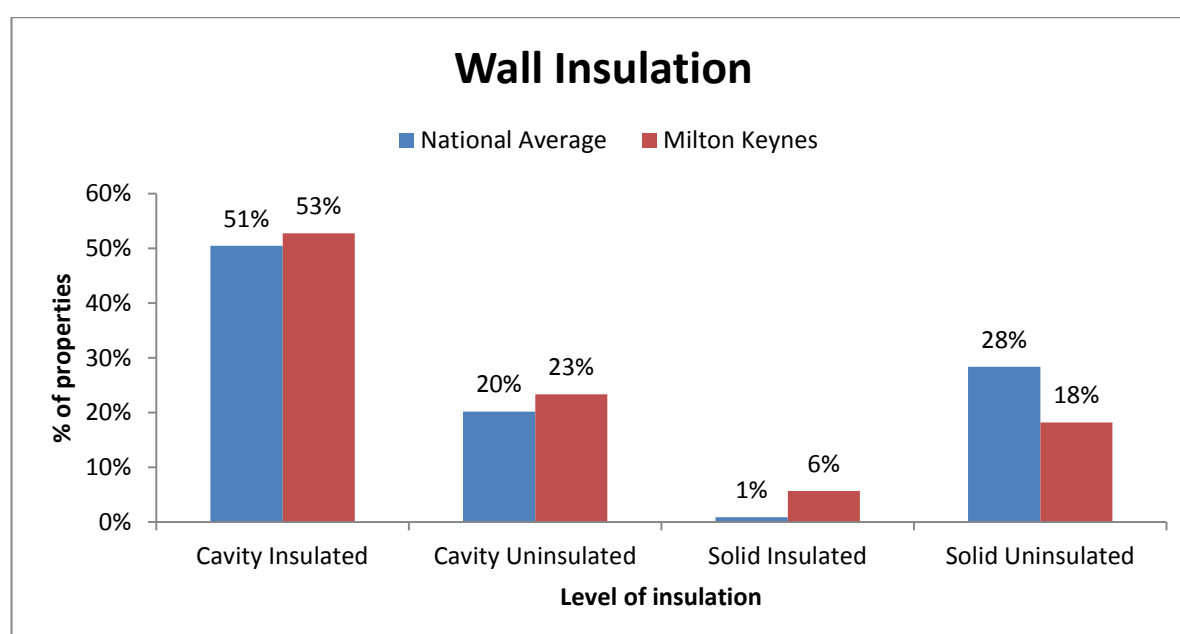
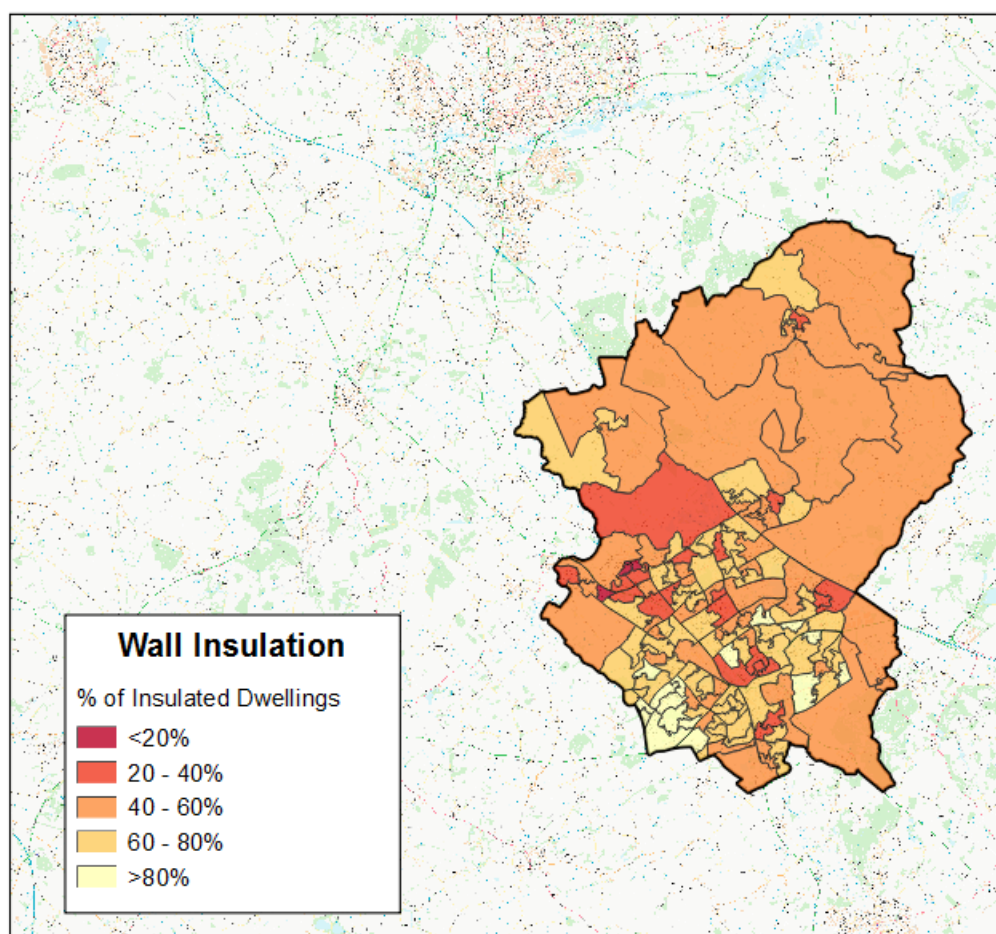


Figure 10 shows a spatial analysis of the proportion of properties with insulated walls in Milton Keynes. The figure is taken from Energy Saving Trust's Home Analytics database. The darker red areas indicate areas with lower amounts of insulation. These are the areas in which schemes could be targeted.

Figure 10: Wall insulation by LSOA

Milton Keynes Council - Wall Insulation by LSOA



2 Local energy efficiency ambitions and priorities

<p>2.1 Regeneration MK</p>	<p>Milton Keynes has a high number of large housing estates which were built in the 1970s and 1980s which are now in need of improvement. In particular there are seven priority estates, which are in the top 15% nationally for areas with multiple evidence of disadvantage and deprivation (IMD 2015). To improve the energy efficiency and overall standard of these houses Milton Keynes Council is planning to undertake a major regeneration project which will take place from 2017 to 2030.</p> <p>To carry out the regeneration a new company, Your MK, has been formed. Your MK is a partnership between Milton Keynes Council and Mears Group PLC. Your MK currently provides repairs and maintenance to the Council's housing stock. Milton Keynes Council will lead the regeneration programme to improve the housing stock in Milton Keynes through investment and community engagement over the next 15 years.</p> <p>Milton Keynes Council has identified 7 of the most deprived areas for regeneration, the areas will be announced by the end of April 2017. Following this announcement there will be a planning phase involving extensive stakeholder engagement to decide on the details of the regeneration. Milton Keynes plans to leverage in private sector financing to support the regeneration of its poorest estates</p>	<p>2017-2030</p>
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<p>2.2 Lakes Estate Regeneration</p>	<p>During 2012-13 major refurbishment works were undertaken to approximately one half of the Council properties on the Lakes estate located in the Water Eaton LSOA. Further funding was obtained to undertake similar estate-based major refurbishment work of the remaining Council properties on the Lakes estate from 2014-16.</p> <p>The works carried out included:</p> <ul style="list-style-type: none"> • Replacement warm roofs (most of the Lakes estate properties have flat roofs) • External wall insulation • Replacement double-glazing, where appropriate • Replacement heating system where necessary <p>Phase 1</p> <p>The first phase of the project (2012-13) funded major improvement works to approximately 470 Council houses on the Lakes estate. The work was primarily to Council properties because it was mainly funded by the HRA. However, a loan scheme for private owners to have similar work compete was put in place but was been restricted to those aged over-60 and to private landlords because of the terms and conditions of the Flexible Home Loan scheme. The overall cost of the first phase of the works was approximately £9.7 million.</p> <p>Phase 2</p> <p>The second phase of the project ran over 18 months from 2014-16 and improved the remaining Council properties in the estate. In total the cost of the works came to approximately £15-£18 million and a total of approximately 1,000 properties were improved through the project.</p>	<p>2012-13 2014-16</p>
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<p>2.3 Housing Stock Improvements</p>	<p>The Council undertakes routine housing stock improvement works to maintain a decent housing stock. The on-going works include the following:</p> <ul style="list-style-type: none"> • Window replacement - Installations of double glazing and replacing failing glazing. • Boiler replacement – The Council replace between 500 - 1000 boilers per year on a 11 year boiler replacement cycle. • Roof replacement and insulating – Replacing faulty roof coverings and roofs with issues with insulated warm roofs (flat roofs are a common roof type in the Milton Keynes' estates). • Refurbishment of communal areas – Installing energy saving measures (e.g. LED lights, PIR sensors) 	<p>On-going</p>
<p>2.4 Renewable Technology</p>	<p>There were 738 domestic solar PV installations claiming feed in tariffs in Milton Keynes between Jan 2015 and Jan 2017, amounting to 2.9MW of generating capacity.</p> <p>The Council has recently installed solar PV on a number of new bungalows in the district. The Council is also investigating the feasibility of re-roofing Council properties with solar PV. This could either take place during the Council's routine roofing improvements or separately on roofs that are already at a good standard. The solar PV installations would generate income for the Council through claiming feed in tariffs, and reduce energy bills of the residents.</p>	<p>2017-18</p>

3 Central Government initiatives

3.1 Green Deal Together	The Council came together with a consortium of other Councils to form the social enterprise, Green Deal Together, which capitalised on the emerging Green Deal market to both encourage local residents to take up the new offer and also support local supply chains in accessing the associated market opportunities. The consortium ended following the closure of the Green Deal.	2014-15
3.2 Energy Company Obligation	<p>The Council are currently reviewing the January 2017 publication of BEIS' response to 'Energy Company Obligation: help to heat consultation'⁵ and its increased focus on Affordable Warmth.</p> <p>In particular, the Council is interested in taking advantage of flexible eligibility to increase the uptake of ECO funded measures due to their experience of a number of residents having been unable to claim ECO funding because they did not meet all the scheme's criteria.</p>	2017-18
3.3 Energy Efficiency Advice	Agility Eco deliver ECO funded energy efficiency advice in partnership with Your MK. Agility Eco manage and deliver the service which provides frontline energy efficiency advice, Energy Performance Certificate surveys, fuel switching advice, energy efficiency improvements (e.g. draught-proofing) to properties of all tenures.	On-going
3.4 Fuel Poverty	<p>The Council's Health and Wellbeing Strategy (2012-15) prioritises reducing the proportion of the population living in fuel poverty.</p> <p>A number of the Council's current programmes that are outlined in this report have a component that helps improve fuel poverty.</p>	On-going

⁵ The Government Response to the ECO: Help to Heat Consultation. BEIS, 2017

3.5 Carbon Offset Fund	<p>The Council has benefitted from being able to use its Carbon Offset Fund, established through Section 106 agreements, in order to help support carbon reduction activity. The fund has been particularly successful in incentivising a wide variety of energy efficiency measures such as installation of insulation, boiler replacements and energy check visits. The fund is currently being used for carbon reduction in non-domestic properties.</p>	<p>On-going</p>
3.6 Innovative Heating Technologies	<p>The Council have trialled a number of domestic biomass boilers and air source heat pumps in rural properties. There have also installed 4 combined heat and power (CHP) boilers in housing. The Council will consider similar innovative heating technologies in future developments.</p>	<p>On-going</p>
3.7 District Heating Network	<p>In 2014 Milton Keynes obtained £53,000 through the Department for Energy and Climate Change's (DECC) Heat Networks Delivery Funding (HNDF). The funding was used for a feasibility study and detailed development stage study into expanding Thamesway's existing heat network in central Milton Keynes to include areas adjacent to the city centre. Along with commercial premises, the existing heat network also supplies residential properties.</p> <p>The Thamesway Central Milton Keynes (TCMK) heat network was established in 2007 to build and operate a Combined Heat and Power (CHP) energy station to generate and supply low carbon district heating and electricity as part of the regeneration of the central business district in Milton Keynes. The heat network delivers both heating and electricity to businesses and homes. Heat for space and water heating is distributed to nearby properties through a network of pipes.</p>	<p>2014-17</p>

3.8 Smart meters	<p>The UK Government expects that most households will have smart meters installed at no cost by their energy company by 2020. Energy companies are currently installing Smart Meters in the authority. Research on some of the first customers who had smart meters installed has shown they reduced their energy consumption by 1.5-2 per cent⁶.</p> <p>Smart meters are being advertised to residents through energy suppliers. The Council may consider using smart metering data from residents to improve energy efficiency, if residents agree that their data may be shared.</p>	2017-2020
3.9 Minimum energy efficiency standards	<p>The Government's fuel poverty strategy, "Cutting the Cost of Keeping Warm"⁷, launched in 2015 confirmed the adoption of new minimum Energy Performance Certificate (EPC) E standards in private rented homes from 2018.</p> <p>Additionally the strategy sets a new "fuel poverty target" of an EPC of C by 2030 for "as many fuel poor homes as is reasonably practicable". This target is supported by two intervening milestones of EPC E by 2020 and D by 2025, for as many homes "as is reasonably practicable".</p> <p>The Council plans to engage with landlords as part of the regeneration strategy in Milton Keynes with the aim to improve the energy efficiency of the private rented sector housing stock. In the cases where the Council rents properties, they ensure that the properties meet the current minimum energy efficiency standards.</p>	On-going

⁶ Smart Metering Early Learning Project: Domestic Energy Consumption Analysis. DECC, 2015.

⁷ Cutting the cost of keeping warm: A fuel poverty strategy for England. HM Government, 2015