



Heat Networks Policy Unit
Department for Energy Security and Net Zero
3 Whitehall Place
London
SW1A 2EG

Email: heatnetworks@energysecurity.gov.uk

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HEAT NETWORK TECHNICAL STANDARDS: BRITISH PROPERTY FEDERATION RESPONSE TO THE CONSULTATION ON INTRODUCING A HEAT NETWORK TECHNICAL ASSURANCE SCHEME

BPF

The British Property Federation (BPF) represents the real estate sector – an industry which contributes more than £116bn to the economy and supports more than 2.4 million jobs.

We promote the interests of those with a stake in the built environment and represent a broad range of investors, owners, managers and developers of real estate as well as those who support them. Our members include the largest UK residential and commercial landlords and have hundreds of billions of pounds of assets under management, including over 100,000 privately rented homes and hundreds of millions of square feet of commercial real estate space. Their investments help drive economic success, provide essential infrastructure and create great places where people can live, work, and relax.

Our response

We welcome the opportunity to respond to the DESNZ consultation paper on introducing a heat network technical assurance scheme (HNTAS).

This is a lengthy and detailed consultation paper, quite technical and complex in parts. As such, we are not in a position to provide a substantive response to the individual consultation questions.

However, many of our members run communal heating systems and others will be customers and clients of heat network operators and suppliers. Some may also be investing directly in new heat networks. As such, we and our members have a very real interest in HNTAS and in the wider programme of regulatory reform.

We would therefore like to make the following points:

- We support the broad policy agenda, including new consumer protections, minimum technical standards and the focus on growing the low carbon heat network market.
- However, we are concerned about the general lack of engagement with the real estate sector and about how well prepared the sector is for the new regulatory regime, including the proposed commencement of HNTAS in 2027. We would seriously question whether the timelines outlined in the consultation paper are realistic.
- We are also concerned about the cost and complexity of the proposals. We note that proportionality is a core principle which is intended to inform the design of new regulations, but we remained concerned about the cost and administrative burden that the proposals could place on some of our members and about the impact this might have on future real estate development.
- We note that the consultation paper explores whether small networks should be out of scope of the new regulations. We would agree – but would question whether the full weight of the regulations should only apply to the larger district heating systems. We think there would be value in exploring whether there should be a separate, simpler approach for landlord-run communal heating systems.
- We would also call for clarity on how the regulations will apply to different asset classes. For example, we have concerns that some of the proposed reforms – such as those around metering and billing - do not make sense for the Purpose-Built Student Accommodation (PBSA) sector. We appreciate this is touched on in the consultation paper but the outcome is not clear. We have raised this separately with officials.
- The consultation paper states that HNTAS will not require heat networks to meet a carbon emissions limit to be granted certification. The intention is that emissions will be reduced by making networks more efficient. There is an inconsistency of approach across Government on this issue. HNTAS will not require existing networks to decarbonise but in other policy areas, such as on Minimum Energy Efficiency Standards (MEES), the proposal is that landlords will be penalised if they are connected to heat networks that are not low carbon, even when they are required to connect, for example as a condition of planning. This can not be correct. Policy across Government needs to be joined up.

We should also add that we are currently surveying our membership to understand more about the potential impact of the new regulations on the real estate sector, not just HNTAS but the full range of new regulations. This will also examine how well



prepared the sector is for the new regulatory regime. Once the research is complete, we would welcome the opportunity to share the results with officials. We would also welcome a meeting to discuss how we might better engage and inform the sector on how HNTAS will impact certain investors and property owners.

Rob Wall
Assistant Director
BPF
RWall@bpf.org.uk