



# G15 response to DESNZ Heat Network Technical Standards consultation

April 2026



## About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 880,000 homes across the country, including around one in ten homes for Londoners. The G15 represents the largest providers of new affordable homes in London and accounts for approximately 15% of all affordable homes built across England. Over the last few years, our members have funded and delivered more than 56,000 new homes in partnership with the Mayor of London. Delivering good quality, safe homes for our residents is our number one priority. Last year our members invested almost £2bn in improvement works and repairs to people's homes, ensuring people can live well.

Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

G15 members also have significant experience in the ownership, operation and development of heat networks, managing a substantial number of communal and district heating systems across London and beyond. This includes both legacy networks, many of which were built before formal standards existed, and new systems being developed to support the transition to low carbon heat. As a result, we have direct operational insight into the affordability, reliability and consumer protection challenges that the Heat Network Technical Assurance Scheme (HNTAS) is seeking to address.

G15 members are active participants in the Heat Network, a sector-wide group of social housing providers representing a significant proportion of UK heat networks. We have contributed to the Heat Network's consultation response to HNTAS and support its overall position. This G15 response should therefore be read alongside that submission, which provides further technical detail and evidence on the practical implications of the proposals.

Find out more and see our latest updates on our website: [www.g15.london](http://www.g15.london)

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing
- Sovereign Network Group

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## **Position Statement**

G15 members know that heat networks can deliver low carbon, cost-effective heat at scale when they are well designed, well run and accountable to residents. That is why we support stronger regulation where it improves outcomes for residents and restores confidence in the sector. As organisations with direct experience of operating, maintaining and procuring heat network services, we have seen both the benefits these systems can deliver and the impact on residents when they fall short. Good regulation is therefore essential. It should protect customers, support fair pricing, improve reliability and help ensure that heat networks remain a credible long-term solution as part of the transition to low carbon heat.

Regulation must be workable, proportionate and grounded in the operational reality of the sector. In our view, the proposals in their current form are too complex, too costly and not deliverable within existing sector capacity. The proposed milestones are unachievable given current funding, workforce and supply chain constraints. The administration costs are also significant and risk imposing further pressure on residents and providers without a clear link to improved customer outcomes.

A central problem is that the current proposals apply a largely uniform technical and assurance model across both new and existing heat networks. We do not believe that is workable. Existing networks vary significantly in age, design, condition, tenure mix and ownership. Many were built before any formal technical standards existed, and many are operated by not-for-profit providers on a cost recovery basis, often under significant financial pressure. New build and existing heat networks therefore require different approaches.

For new build heat networks, we support a clear, outcomes driven and verifiable technical standard based on TS1 (the proposed technical standard for new build heat networks), backed by simpler organisation level assurance and a minimum five-year transition period that reflects development and planning cycles. This should ensure that new systems are designed and built to deliver good resident outcomes from day one.

For existing heat networks, we support a distinct, outcomes-based approach that focuses first on the issues that matter most to residents: minimum service levels, fair and transparent pricing, practical metering, fair treatment in mixed-tenure settings (including the challenges faced by leaseholders), and phased long-term improvement planning. This is a more proportionate route to improving legacy systems while allowing investment to be planned and delivered sustainably over time.

We are also concerned that the market is still fragmented and at different stages of capability and investment. A highly complex assurance regime introduced too quickly risks outpacing sector capacity, increasing costs and discouraging organisations from investing in or continuing with heat networks. That would run counter to the wider policy objective of expanding heat networks in the right places.

We therefore support pausing the Heat Network Technical Assurance Scheme (HNTAS) in its current form and undertaking a review, with the aim of redesigning it as a simpler and more proportionate framework that raises standards, protects residents and remains deliverable across both new and existing systems. This should be supported by targeted funding to manage the cost impact on residents and providers, a more practical metering approach for legacy networks, and a clear, long-term strategy for skills, training and supply chain development to ensure the sector has the capacity to deliver these standards so that

regulation strengthens the sector rather than placing undue financial pressure on residents or undermining investment in heat networks.