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BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs	
<b>BUILDING REGULATIONS IN WALES PART L (CONSERVATION OF FUEL AND POWER)</b>	

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

As our interest in the consultation is peripheral to its main purpose we think it inappropriate to complete the questionnaire but offer our comments by letter.

Whilst accepting that the matter is largely a trade-off with costs, we would wish to see the targets for CO<sub>2</sub> reductions set at the highest possible level for both new and existing buildings. Existing buildings, including those of traditional construction such as historic buildings, can contribute considerably to overall energy reduction without affecting their character and appearance so long as they are treated to carefully considered and appropriate intervention.

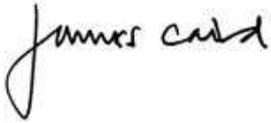
We approve of the "recipe approach" to these issues, particularly as regards existing buildings. This is because existing buildings are not best served by standardized approaches to insulation and other energy-reduction proposals and need to be treated on a case-by-case basis, taking into account the nature of the construction type and the historic character of the building.

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One omission which we would like to see pursued in relation to existing buildings is the use of life-cycle assessment to evaluate both the embodied energy of the existing building and the comparison of energy consumption in conversion and renovation against the energy consumption implied by replacement with new construction. We think this should form a part of the methodology, or at least be allowable under it, in the best interests of not just energy conservation but also the historic environment.

In certain cases life-cycle analysis might be appropriate for new buildings as well.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator