



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Building Regulations Part R consultation  
DCLG

Submitted responses to the questions  
In the Survey Monkey survey.

James Caird  
Consultant Consultations Co-ordinator  
IHBC Business Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA

11 January 2016

Tel (01584) 876141  
Web site [www.ihbc.org.uk](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Sirs

## **BUILDING REGULATIONS PART R**

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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. Our response to the Consultation questions are as follows.

Q1. Do you agree with the Government's view that the Building Regulations are the most appropriate mechanism for delivering European requirements for providing in-building physical infrastructure for super-fast broadband?

**Yes/No**

Q2. Is the proposed guidance in the Approved Document clear and fit for purpose?

**Yes/No** There should be a clearer explanation of the requirements in that the exemption only applies when the installation would unacceptably affect the character or appearance of the building. We think guidance should be added to the effect that alternative solutions to make the exemption unnecessary should always be sought.

Q3.

The diagrams in the draft Approved Document are illustrative only. Are they accurate and do they provide sufficient detail?

**Yes/No**

Q4. Some of the definitions of key terms in Appendix A of the draft Approved Document – for example of ‘major renovation works’ – are abridged versions of those in the Directive. Are the definitions accurate and clear?

**Yes/No**

Q5. Do you agree with the proposed exemptions to the requirement for providing in-building physical infrastructure for super-fast broadband set out in paragraph 1.1 of the Approved Document?

**Yes/No**

Q6. Are there additional exemptions that you feel should be considered?

**Yes/No** We think World Heritage Sites should have a specifically mentioned exemption.

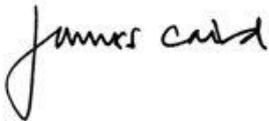
Q7. Do you agree with the assumptions, costs and impacts set out in the Impact Assessment?

**Yes/No** We think the assumptions are reasonable.

Q8. Please set out any additional comments you have below.

We have no further comments

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