



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Jenny Taylor
Faber Maunsell
Marlborough House
Upper Marlborough Road
St Albans
Hertfordshire
AL1 3UT

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

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Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Ms Taylor

PART L OF THE BUILDING REGULATIONS

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.

The Institute welcomes the opportunity to comment on the consultation.

The Institute supports the principle that historic buildings should contribute to the reduction of CO₂ emissions by having their energy efficiency enhanced whenever this can be done without adversely affecting the historic character and appearance of the building or its long-term structural integrity.

We welcome, therefore, the retention of the advice in part L about this proposed to be contained in paragraphs 3.6 – 3.8. We are particularly pleased to see the broad definition of historic building to include:

- ◆ Buildings in conservation areas, National Parks, AONBs, World Heritage Sites etc.
- ◆ Buildings of traditional fabric with permeable construction.

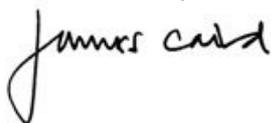
However, we are concerned at the retention of the expression “development plan” in paragraph 3.6(a). Whilst this term reflects continuing practice in Wales, we think it may be misleading bearing in mind that under the new regime of Local Development Frameworks “Development Plan Documents” are unlikely to contain this sort of detail. We think the reference should be to “development plan or Local Development Framework”.

We are also please to see the retention in paragraphs 3.7 and 3.8 of references to:

- ◆ The contribution to improved energy efficiency that historic buildings can make.
- ◆ The need for care when improving the energy efficiency of buildings of traditional construction.
- ◆ The desirability of seeking advice in the English Heritage advice note *Building Regulations and Historic Buildings* and from conservation officers.

As we are sure you know, a Heritage Protection Bill is to be introduced into Parliament in the next session. This will change much of the terminology and procedure in relation to heritage assets including the introduction of local lists of assets. Further amendments are to Part L are likely to be necessary to accompany implementation of the Act in 2010.

Yours sincerely

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator