



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Jennings

DECC'S REVIEW OF IN USE FACTORS: CALL FOR EVIDENCE

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. We wish to join the representations made to you by the Sustainable Traditional Building Alliance as follows:

We are concerned at the unreasonably short time given for responses to this call for evidence.

We are also concerned about the relation of this call to the process proposed in DECC's October 2012 publication: "How the Green Deal will reflect the in-situ performance of energy efficiency measures".

- This call for evidence lists a slightly different and shorter set of reasons for the discrepancy between modelled and actual performance. In particular points c and d of para 6 seem to have been omitted. Point d (element U value assumptions) is particularly relevant.
- There are three sources of information listed in the document (paras 36-38) which will be used by DECC (and the Measures Expert Group) to review the IUFs. The first is ongoing monitoring which will be integrated into NEED. The second is "monitoring under the Green Deal" by the oversight and registration body. The third is data from industry. It would be good to know whether all these types of monitoring have been undertaken. Otherwise it is would be very worrying to think that calling for industry evidence in such a short period would constitute an acceptable process.

As per paras 41 and 42 we agree that this process of monitoring and feedback could be important to driving innovation and improved product/supplier performance. For this reason it seems important to us that sufficient time and information is given to industry (and non-commercial NGOs) to ensure this process fulfils its potential.

Evidence:

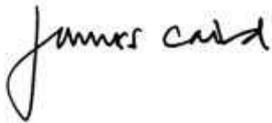
In regard to Para 6, point d, we know that the Solid Wall research commissioned by DECC from BRE Wales is presenting evidence both about actual solid wall U Values (as measured in-situ) and also about the effect of trapped moisture on thermal conductivity.

The work of SPAB on thermal performance is also essential in this review. Please see http://www.spab.org.uk/downloads/Courses%202014/SPAB_BPSReport%202013Final.pdf. Another report is due this year.

As you are aware there are some basic shortcomings in SAP and RdSAP which are at the root of many of the discrepancies between the modelled and actual figures particularly in relation to solid wall insulation performance. Key information about these can be found in Historic Scotland's Technical Papers 3, 4, 5, 8, 16, 17 and 18.

We hope this response is helpful.

Yours sincerely

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