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Dear Sir

BSI PAS 2038

The Institute of Historic Building Conservation 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.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

The PAS 2038 does build on and improve on PAS 2035. But as with PAS 2035, the draft PAS 2038 fails to emphasise the need to carry out appropriate repairs as the vital precursor to installing retrofit measures.

The scope of PAS 2038 is very narrow concentrating on only retrofit and not any other ways to improve the energy performance of buildings. There are other ways to improve the energy performance of buildings before introducing retrofit measures and these should be considered too.

4.3 Note 1 & 9.2 The person carrying out the work needs to have professional skills and experience in dealing with building fabric. This is especially important where buildings are of historic value or traditional

construction. This way be wider than the architect or architectural technologist specified.

- 5.1.3 Should read repairs OR maintenance not repairs of maintenance.
- 5.4 Should require appropriate repair, with consideration to be given to either like-for-like or justified change.
- 6 & 8 Has no mention of embodied carbon or Life Cycle Analysis
- 8c Items of repair and planned preventative maintenance should also be included as other possible things being planned
- 9 Should include repairs as precursor to installing measures.
- 9.2.e) & 10 Should reference the scope for special consideration for historic and traditional buildings under L2B of the Building Regulations
- 11 Should mention repairs.
- 13.3 Needs to include a projected Life Cycle Analysis (of all repairs and installed measures), with specific reference to durability of installed measures, until 2050. It would be wrong to install short-lived measures which may need replacing once or more before the Net Zero deadline¹.
- Bibliography Contains some repeat entries and some live links need to be added or checked.

Yours sincerely

Fiona Newton
IHBC Operations Director

¹ See the "Full Carbon History" in Harry Paticas's Bournville low carbon retrofit project https://stbauk.org/wp-content/uploads/2020/08/Heritage-Counts-Case-Study_Bournville-Low-Carbon-Retrofit.pdf.