



Brian Such MCM1
BSI
389 Chiswick High
Road London
W4 4AL

The IHBC National Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA
Consultations@ihbc.org.uk
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Dear Sir

Consultation – Publically Available Specification 2030

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.

The PAS:2030 (Publically Available Specification) is not a specification in the proper sense of the word (“an act of identifying something precisely or of stating a precise requirement” and “a detailed description of the design and materials used to make something”). It is, in fact, a long list of BSI documents and standards that a designer/installer of energy efficient measures (who have a vested interest in installing) should be aware of – ranging from equipment specific knowledge and more generalised construction knowledge, through to detailed planning, building or historic building legislation. It creates a process that suggests that the designer or installer WILL HAVE taken all of these into account before the installation of EEMs. In doing so, the PAS implies that:

- a building owner is relieved of responsibility, having employed a purported expert
- EEM installers will make decisions independent of their own commercial interests
- one individual or small organisation can have the necessary spread of knowledge
- installers will be able to access, comment and advise on elements outside their immediate area of expertise.

The draft PAS seems to start at the time when the decision to retrofit has been taken. There is no consideration whether retrofit is appropriate, what other actions might be preferable, what is the condition of the building fabric, and how that affects energy efficiency, or of what skills are needed for the appropriate repairs which are an essential prerequisite of any effective EEM.

We are disappointed to see that the draft has not taken on board the concerns that IHBC raised in 2011 in the letter to Brian Such of 25th October 2011 (http://ihbc.org.uk/consultations/docs/PDF/PAS2030revised_response.pdf) . These were recognised (albeit to a limited extent) in the safeguards for vulnerable buildings as set out in paras 41-44 of the Green Deal Provider Code of Practice, but not mentioned in the PAS. The failure to provide such safeguards in ECO has led, and is continuing to lead, to waste of carbon and money on inappropriate EEMs requiring subsequent rectification.

The draft PAS continues to overlook a number of important and relevant pieces of guidance and evidence:

- the specific safeguards in Part L of the Building Regulations
- BS7913: 2013, which deals specifically with these issues and which should be cross referenced with the PAS. It is disappointing that BSI has produced a document with no reference to BS 7913: 2013 and it is likely that work through PAS 2030 will not comply with BS 7913: 2013
- the recommendations of the Hansford Review and Bonfield (when published)
- the full implications of the body of evidence (notably from BRE's Solid Wall Study) of major problems arising from inappropriate application of EEM

- BS 5250: 2011 Code of Practice for Control of Condensation in buildings, which stresses the need for understanding and controlling condensation – and for proper diagnosis of existing problems (4.6), before making changes. Section 6 covers remedial works, and states *"Any action to control condensation should take into account the intended use of the building and involve comprehensive consideration of heating, ventilation and thermal insulation."* It does very clearly state that this is a very complex field – in the introduction: *"The occurrence of condensation is governed by complex interrelationships between heat, moisture, air movement, building layout, and the physical properties of building materials."* It goes on to say: *"It should not be quoted as a specification, and care should be taken to ensure claims of compliance are not misleading - any user claiming compliance is expected to be able to justify any course of action that deviates from recommendations."* The draft PAS underestimates the nature and detail of training required for anyone to be competent in these subjects. 5250 just lays the ground rules, and clearly states what a complex area it is.

If the draft PAS is used to guide ECO or any other EEM works, this will lead to a further waste of both carbon and finance on inappropriate EEM, which then have to be subsequently rectified.

Radical change is needed to make installers and certifiers aware of the issues, and ensure that they properly trained with relevant qualifications (i.e. based on the NOS for Older Traditional and Vulnerable Buildings).

The draft PAS fails to provide rigorous control or transparency of the certification system. Suitable oversight would have prevented cavity wall insulation failures and unsuitable certification of damp-proofing remedies.

We would suggest that any such proposals are piloted and tested on a proper sample of the existing building stock to include the diversity of range, location, occupancy etc. to assess and evaluate such actions before they are mainstreamed.

We will add these very specific comments to the working draft online but repeat them below for completeness:

4.2.1 Information sourcing

This requires competence in understanding the type of building and consideration that 25% of UK building stock are traditionally built (and probably many more if inter-war solid wall buildings are taken into account)

4.2.2 EEM specification planning

This section should refer to BS 7913: 2013, if not it would seem like a contradiction from BSI. It should also mean undertaking heritage impact assessments for all traditional buildings and taking a pathological approach to understanding dampness in buildings.

There should be reference to UK weather exposure zones and an evaluation of what this means.

4.2.3 Identification and selection of suitable EEM

Reference to BS 7913: 2013 will guide the selection of products.

4.2.4 Reference to external standards or other documents

BS7913: 2013 and BS 5250: 2011 should be added to the list.

6.2.1 Undertaking the survey

Appropriate competence is required and this must include competence in traditional buildings, considering the huge proportion of traditional building stock. Reference to BS7913: 2013 would do this. Competence in traditional Buildings for this purpose requires completion of a qualification satisfying National Occupational Standards ASTOTV1 (“Recognise the age, nature and characteristics of older and traditional buildings” <http://nos.ukces.org.uk/PublishedNos/ASTSOTV1.pdf>), ASTOTV2 (“Evaluate the appropriate options for the introduction of energy efficiency measures for older and traditional buildings” <http://nos.ukces.org.uk/PublishedNos/ASTSOTV2.pdf>) and ASTOTV3 (“Make recommendations and give advice on the introduction of energy efficiency measures

in older and traditional buildings

<http://nos.ukces.org.uk/PublishedNos/ASTSOTV3.pdf>).

The required qualifications are provided by courses delivering the SQA Award in Energy Efficiency Measures for Older and Traditional Buildings GJ0H 46 (Scotland) and Agored Cymru (QCF) 601/3879/8 (Wales).

9 Documents essential to the application of the Annexes of this PAS 9.1 Use of the identified documents

Reference should be made to BS 7913: 2013.

Yours sincerely

A handwritten signature in black ink, appearing to be 'FN', written in a cursive style.

Fiona Newton

BA (Hons), MA (arch cons), Dip URP, MRTPI, IHBC
IHBC Operations Director