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BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Such

PAS 2030 - IMPROVING THE ENERGY EFFICIENCY OF EXISTING BUILDINGS

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.

Thank you for inviting us to participate in this consultation, and for allowing this late submission.

The Institute supports the improvement of energy efficiency of existing buildings and is pleased to see a specification for achieving this in progress. But we are concerned that the proposed PAS pays insufficient attention to the wide variety of existing building types, and the variety of their performance characteristics. It is our view that energy efficiency strategies need to be tailored to each building by someone of competence, to avoid works which would weaken the fabric of the building and would thus shorten its life or otherwise adversely affect its value.

This is a very serious issue for the Green Deal, given that up to 25% of the building stock comprises historic and traditional buildings, particularly those pre-1919, which perform in very different ways to those of more modern construction. Inappropriate or injudicious works to such buildings could be severely counterproductive, and involve very significant waste of public money.

The draft is long and complex but we can see the following detailed shortcomings.

We note that this is to be a Publicly Available Specification, not a British Standard. It should be cross-referenced to all relevant British Standards. We would particularly wish to see cross-referencing to BS7913:1998.

A second major consideration, which needs specific referencing under section 1 “Scope”, relates to the Statutory and regulatory environment. The one-sentence legal disclaimer in the draft PAS is totally inadequate, and does not indicate what relevant legal obligations might be applicable. This specification should ensure that Installers and Green Deal Providers are clearly aware of both controls (Planning, Listed Building and Conservation Area legislation) and the special considerations under the Building Regulations (Part L1B paras 3.6 to 3.13; Part L2B paras 3.6 to 3.13) for historic and traditional buildings. None of these provisions, which are highly relevant to Installers and Green Deal Providers, are mentioned in the draft PAS.

The Institute is very concerned that the Green Deal appears to rely on, and require the use of, authorised “surveyors” (3.17) who may only have completed an “installer designed training programme” tailored to one product or system. This will not provide the overall understanding of how a building performs, and the range of potential options for improving energy efficiency, which are needed for effective delivery of the Green Deal. It is our experience that the most effective performance improvements of traditional buildings are often achieved through a combination of measures. To provide this, Green Deal Providers, their approved surveyors, and all providers of design specifications (4.2.1) need to have a thorough overview.

We note that the critical relationship under the Green Deal is between the installer and the Green Deal Provider (i.e. not the customer, 3.7). We are concerned at the potential for Green Deal works being carried out in the interests of the programme, the Provider and Installer without independent advice being available to the building owner on the risks that any works might have for the performance, integrity, character and value of his building. This is particularly important because it may be many years before the effects of ill-advised works become apparent.

In this context both Installers and Green Deal Providers have to be made aware of their potential legal liabilities in terms of the legal constraints on those who cause, or carry out unauthorised works to listed buildings. Such constraints can include seemingly minor matters which may not be apparent at the time of survey, and arise only because of the installation technique chosen.

We think it is inappropriate, therefore, for the competences of surveyors and installers to be limited to the specific systems they install and to specific “building types” (as suggested in the Annexes). We think it is essential for surveyors to have competence in general construction types, and it would be very helpful to have particular recognition of competences in traditional construction.

We note that while requirements are cross-referenced to the Building Regulations, no mention is made of the their exceptional provisions (under Part L) designed to ensure that energy efficiency improvements to historic and traditional buildings are appropriate in terms of their construction and character. This omission has to be remedied, to avoid counter-productive and damaging work, and wasting public money.

We understand the logic of the specification being arranged in Annexes but we are concerned about the impression of compartmentalization that this gives. Buildings behave holistically, and there is plenty of scope for actions taken under one part of the PAS to have unforeseen implications in adjacent fabric.

We have particular concerns in relation to Annexes J, K, L, M, O, R, U, V, W, Y, and Z. Where alternative competence requirements are offered, we would generally support the first, shorter requirements that require familiarity with the building type, but subject to the strong proviso that this requirement needs to be more stringent. We are concerned that the National Occupational Standards, which appear to be a key part of the second approach offered, do not appear to even touch on the performance characteristics of traditional and historic buildings. The GQA Level 3 NVQ in Fenestration Surveying, noted as a route to competence for Annex R, is similarly and very worryingly flawed, as it makes no mention of the Building Regulations special consideration for historic buildings.

Annexes J to M take no account of the way in which traditional buildings “breathe” . This is most surprising and worrying given the specific recognition of this issue in the Building Regulations (see paras 3.8c and 3.12c of Part L1B and Part L2B). These problems have to be addressed if major problems are to be avoided. Annex M is a particular concern both for this functional reason (new impermeable coatings would risk just the same problems as have been experienced with cement render applied to traditional buildings - often only remedied at great expense and with unavoidable renewal of building fabric), and because in many instances it would fall foul of planning and/or conservation area controls.

In conclusion, we are very concerned indeed that a draft PAS with admirable aims is so severely flawed in terms of historic and traditional buildings. As it stands, for the reasons noted above, it is unlikely to deliver the Green Deal aims effectively for up to 25% of the building stock, it risks wasting considerable public resources in inappropriate and ineffective works, and in the process it could severely threaten the character of the historic environment.

We hope very much that fine-tuning of the final PAS will take these issues on board. The Institute will be pleased to advise further if this would be of help.

Yours sincerely

John Preston

for the Institute of Historic Building Conservation