



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear McInerney

PARTS L AND F 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.

Thank you for inviting us to participate in this consultation. We are specifically interested in the impact of the proposed changes to the Regulations as they affect listed buildings and other historic assets.

PART L

We are in general agreement with the sentiments of the draft Approved Document that historic buildings have a part to play in meeting greenhouse gas targets but we do not agree with the way in which the Document proposes to express them.

In particular, the Institute strongly objects to the proposal to "remove the exemption" from compliance with the Regulations as set out in Paragraph 7 of Table 4 of the consultation.

Works to historic buildings that are not conducive to their long-term preservation do not save energy if they result in periodic remedial works or the premature replacement of the building. It is important to see the stock of historic buildings as a resource which embodies energy as well as a cultural resource. The proper management of that resource is an important feature of the overall programme of greenhouse gas reduction.

The view of many of the Institute's members is that the need to consider the special interests of historic buildings as set out in the present Approved Document L is often disregarded in the implementation of energy-saving works to existing buildings and that fabric of architectural and historic interest is being unnecessary lost as a result. We

think the proposed amendments would worsen this tendency. A more detailed description of the survey from which this view arose by Chris Wood of English Heritage was published in our magazine *Context* in May 2009. I attach a copy of this for your information.

The advantage lies in the use of the word "exempt" or "exemption". It is a useful shorthand for conveying the broad principles of the need to have special consideration in the case of historic buildings.

We are not entirely clear why styling the procedure as "special considerations", as set out in proposed, rather than as "exemption" should be regarded as important. We feel that the proposals are, *de facto*, an exemption and that there is little harm in using the word "exemption" to describe them.

We would like to see the following wording used for Paragraphs 3.6 of ADL2A and 3.9 of ADL2B:

3.6 [3.9] When establishing reasonable provision for the conservation of fuel and power, special considerations apply to the following classes of building which are exempt from other provisions of this Document:

a) ...

We understand that the stated reason for removing the word "exemption" is the feeling in some quarters that valuable energy-saving initiatives are being lost as a result. We think that its removal would result in more ill-considered proposals and, overall, very little saving in energy at the cost of the loss of significant architectural and historic interest.

Otherwise we agree with the wording of the proposed arrangements. In particular we support the advice regarding consultation with the the local authority's conservation officer. But we would point out that not all local planning authorities have in-house conservation officers and the words "...or designated consultant..." might be added here. We would also support a general sentence of introduction to the issue in both Paragraphs 3.6 of ADL2A and 3.9 of ADL2B. We particularly like the form of words which is proposed for at Paragraph 7.21 of ADF. If added to our suggestion above, the whole would read:

3.6 [3.9] Conserving the special characteristics of historic buildings needs to be recognised: see BS 7913. In such work, the aim should be to improve [energy efficiency to the maximum practicable extent] taking into account the need not to prejudice the character of the historic building nor to increase the risk of long-term deterioration to the building fabric or fittings. When establishing reasonable provision for the conservation of fuel and power, special considerations apply to the following classes of building which are exempt from other provisions of this Document:

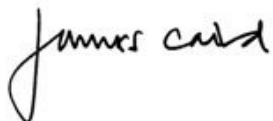
a) ...

continued...

PART F

The Institute would like to see the provisions for this part set in similar terms to those we advocate for Part L above. We can see no reason for a such a significant difference in approach or proposed wording. We think consistency of wording would aid general understanding of the measures as a whole.

Yours sincerely

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large, looping initial 'J'.

James Caird
Consultant Consultations Co-ordinator