IHBC

INSTITUTE OF HISTORIC BUILDING CONSERVATION

Building Regulations Division
Office of the Deputy Prime Minister
18/B Portland House
Stag Place
London
SW1E 5LP

Mr David J Chetwyn, MA, MA, MRTPI, IHBC
IHBC Consultations Secretary
142 Richmond Street,
Penkhull,
Stoke-on-Trent,
Staffordshire,
ST4 7DU

Tel: 01782 413896
Mob: 07974 099635
E-mail: consultations@ihbc.org.uk

23 December 2002

Dear Sirs

Possible Future Performance Standards for Part L - October 2003

I refer to the above document and would like to respond to its content.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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 IHBC recognises the importance of the energy conservation agenda and supports the Government's continuing efforts to fulfil its commitment to the Kyoto agreement.

Whilst the above document is at an early stage of delivering future improvements in energy saving in buildings, the Institute is grateful for the opportunity to participate in the process.

It is noted that the Government in clause 60 intends to retain the guidance that recognises that new energy saving standards may not be appropriate for historic buildings. We assume that the wording of the clause in the current ADL will be simply brought forward into the new ADL. However, the Institute is concerned that this clause is not mentioned under the section 'Refurbishment of the existing stock' (clauses 134 - 138) and trust this oversight will be corrected for non-dwelling historic buildings in future documents and ADL2.

The Institute welcomes those measures which underline the cultural importance of historic buildings. IHBC members are aware of their responsibility to take reasonable steps to reduce energy loss where it can be achieved without harm to the character and importance of the historic building. Building Control chiefs in general feel confident that Part L is being implemented flexibly and they seem to be taking a sensible approach. However, IHBC members in some areas of the country report that this

important clause is not being implemented by Building Control Departments and officers and, particularly with windows, ADL is being enforced without sufficient sensitivity to the historic building in question. It would be immensely helpful if the Department would issue further, strongly-worded guidance to building Control Departments encouraging a more flexible and sensitive approach, recognising the requirements of heritage legislation and the importance of inter-professional dialogue.

The biggest problem with windows stems from the activities of Fensa registered companies. Fensa urges registered installers to comply with the Building Regulations and to leave cases involving historic buildings to the normal Building Control routes. From local authority returns we know that this is not happening, indeed Fensa installers are totally ignoring this. This undermines the efforts of the ODPM & English Heritage to minimise damage resulting from the new Part L. Confidence is further eroded by the fact that of the paltry 1% of inspections that were carried out in the first quarter that Fensa were operating, 26% of them failed.

The Institute is pleased to see the evolving appreciation of embodied energy (clauses 20 and 21) but is concerned that progress on embracing this self evidently important matter is not speedier. This is especially disappointing as the ODPM commissions consultants to produce data on many subjects where a tightening of regulations is sought. The current AD approach focuses on the 'Revenue' costs of energy in building. The IHBC believes that only when the 'Capital' energy costs embodied in its bricks, tiles, mortar, metals, glass, timber, plastics and other materials is quantified and weighed against the consequent 'Revenue' cost that a true picture and assessment of life-cycle energy costings in buildings will be achieved. The conservation of historic buildings is an intrinsically sustainable practice, given the massive amounts of embodied energy invested in their construction and in the process of demolition and redevelopment. The energy used to manufacture materials and construct a building is often greater than the energy used during the building's lifetime. It is our conviction that the thermal insulation value and Capital- Cf - Revenue benefits of traditional materials and building techniques is greatly undervalued. We are similarly concerned that now that sustainable softwood forestry is a reality, the public are still, through price and advertising, encouraged to replace timber windows and doors with PVCu and other unsustainable products. Concern continues to be expressed about the dioxin content of some plastic building products. Timber windows can achieve the same levels of energy conservation of 'modern' materials. As the purpose of ADL is to help conserve and preserve the planet, joined up government thinking would, we believe, include fiscal controls to level this price difference if not tilt the consumer towards sustainable building products. As that may well be beyond the remit of the ODPM, we strongly urge you to commission data on this topic. To leave it 5 years before the next review may well prove very costly for the historic environment.

Many IHBC members are involved in design work for extensions and new buildings in historic areas. The Institute is pleased to see that the document recognises (under General clauses 23 - 25) the need for the AD to be flexible and capable of supporting 'sufficient design flexibility'. The IHBC is concerned that, to date, energy conservation measures have encouraged 'set solutions' and thus helped diminish the architecture of new dwellings and produced a poor range of design solutions. This was precisely the concern of IHBC, English Heritage and other heritage groups who were alarmed by the original proposals in 2000. Measures to date have acted as a straight jacket on architectural creativity, innovation, variety and character. We believe that a flexible approach written into the AD, coupled with better interpretation and inter-professional dialogue, could help solve the problem.

However, we note with concern clauses 52 and 53 (The effect of size and shape) which could, if implemented without sensitivity to the qualities of good design and character, lead to bland, simple box-like structures with little interest and no articulation. As these would be relatively cheaper to build than better articulated and juxtaposed forms and shapes, and could be exploited by some developers and house builders to justify dull and bland developments.

The Institute is concerned about air tightness standards being raised. (paras 31-32). Where historic buildings with solid walls are affected, a reduction in ventilation could well inhibit the normal breathing through the fabric. It is appreciated that Building Control should be aware of these issues, but it would be very helpful if this was pointed out in the amended Part L.

The IHBC welcomes the parallel revisions to Part F. Medical researchers need to be included on the Working Party. Much recent research points to increasing standards of air tightness as one reason for the increased proliferation of allergic infections such as asthma and eczema.

Para 38 refer to pressure testing dwellings. Presumably there is no intention to include conversions and extensions in this? Whilst there is no objection in principle to pressure testing, flexibility needs to be shown in the case of many former historically important industrial and commercial premises, which were constructed with solid walls and still require more ventilation to remove moisture evaporating from internal porous surfaces. Obviously a lot more historic buildings will be captured when the floorspace is reduced to 200m^2.

Para 58 refers to the potential advances in soft coat technologies. Whilst the value of this is clear, do we know about the longevity of these applications to windows? Argon gas fill for example does escape and in time windows with this will be losing their effectiveness in preventing heat loss. Applicants are always pressing for new technologies to be accepted in historic buildings. Conservation professionals need to know about the long term performance of new materials and designs before recommending their use.

Para 61 thresholds provides flexibility but then proposes the worst allowable U value of any individual element of the given type being 3.3. If this is rigidly applied it will preclude a number of imaginative methods of upgrading including the use of heavy curtains, draught-proofed shutters, and insulated blinds etc, all of which allow the retention of existing windows. Para 91 reinforces this concerns because of the desire to raise the performance standards of windows in existing buildings to keep them in line with new dwellings.

Para 92 suggests that some repair and maintenance work may became a material alteration and therefore subject to the Building Regulations. Roofworks are implied here. Concerns stem from the major changes to design which will follow as these could seriously affect the appearance and performance of historic roofs, many of which have survived for many centuries. Knowledge about the relationship of moisture movement, condensation and ventilation is not adequate to allow robust designs for new buildings to be effectively applied to existing buildings.

Para 139 proposes that extensions should meet the standards for new build. Extensions to historic buildings are often designed in a modern style, and in such instances new-build standards are achievable. However, in many instances, especially for very modest extensions, architects may continue the style of the host building. In such instances, the detailing of the extension is crucial. Whilst most of the new fabric can accommodate insulation standards expected of new build, windows cannot if they are expected to match. Double glazing does not replicate single glazing, particularly if the windows are subdivided by thin glazing bars. Allowance for this should be mentioned in the document.

The Institute trusts these comments are helpful and looks forward to being consulted on the next stage of the process.

Yours faithfully

Dave Chetwyn
Consultations Secretary