



Building Regulations Consultation  
Construction Unit  
Environment and Sustainable Development Directorate  
Welsh Government  
Rhyd y Car Offices  
Merthyr Tydfil  
CF48 1UZ

20 February 2013

Dear Sir / Madam,

## **Consultation on Draft Building Regulations &c. (Amendment) (Wales) Regulations 2013**

Thank you for the opportunity to comment on the draft Building Regulations &c. (Amendment) (Wales) Regulations 2013.

### **The Institute for Archaeologists**

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. IfA's Wales / Cymru Group has over 100 members practising in the public, private and voluntary sector in Wales.

## **Draft Building Regulations &c. (Amendment) (Wales) Regulations 2013**

### **General**

IfA generally supports the Green Deal and the measures proposed in this consultation to further this initiative and to implement Directive 2010/31/EU. However, the Institute remains concerned about the application of the Green Deal to the historic environment and, in particular, to historic buildings (whose embodied energy and cultural significance should be fully recognised). The consultation refers to regulation 21(3)(a) of the 2010 Building Regulations (which exempts listed buildings, scheduled monuments and buildings in conservation areas from energy efficiency requirements where this would affect their character or appearance), but this would not, for instance, necessarily protect locally listed buildings.

Notwithstanding the above concerns (and given the terms of the Directive which these regulations seek to implement), IfA recognises the practical considerations in favour of consistency with Building Regulations in England.

Furthermore, the Institute supports the use of accreditation for energy assessors and approved inspectors. There may be scope (with suitable checks and balances such as a requirement for

membership of a recognised professional body to ensure professional accountability) for wider use of such schemes in relation to the historic environment.

### **Specific Questions**

**Question 1: Do you agree with our proposed approach, that the additional exemption listed in paragraph 31 above should not be added to the exemptions in regulation 21 of the building regulations?**

1.1 Yes, but see above as to IfA's concerns in respect of the historic environment.

**Question 2: Do you agree with the proposed application of option (b)?**

2.1 No comment.

**Question 3: Do you agree with our proposal to mirror England's Regulations which transpose articles 2, 3, 6, 7, 9 and 11 of the Directive?**

3.1 Yes. See above.

**Question 4: Do you agree with our proposal that our draft Regulations which facilitate the Green Deal in Wales and which amend the provisions that provide for completion certificates in Wales should mirror England's Regulations?**

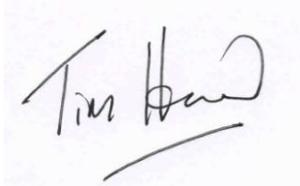
4.1 Yes.

**Question 5: Do you agree with the costs and benefits outlined in the RIA?**

5.1 These issues are better addressed by our members individually.

If there is anything further that the Institute can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Policy Advisor