

# Proposed Domestic Building Environmental Standards (Scotland) Bill

## Introduction

A proposal for a Bill to introduce new minimum environmental design standards for all new-build housing to meet the Passivhaus standard or a Scottish equivalent in order to improve energy efficiency and thermal performance.

The consultation runs from 4 May 2022 to 27 July 2022

All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document.

Questions marked with an asterisk (\*) require an answer.

All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response.

Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded.

Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available [here](#):

[Consultation Document](#)

[Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice which explains how my personal data will be used.

## About you

Please choose whether you are responding as an individual or on behalf of an organisation.

Note: If you choose "individual" and consent to have the response published, it will appear under your own name. If you choose "on behalf of an organisation" and consent to have the response published, it will be published under the organisation's name.

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

*No Response*

Please select the category which best describes your organisation

Representative organisation (trade union, professional association)

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

Please provide your Full Name or the name of your organisation. (Only give the name of your organisation if you are submitting a response on its behalf).

(Note: the name will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is the name that will be published with your response).

ASLEF

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number.

We will not publish these details.

## **Aim and approach - Note: All answers to the questions in this section may be published (unless your response is "not for publication").**

Q1. Which of the following best expresses your view of the proposed Bill? Please note that this question is compulsory.

Fully supportive

### **Please explain the reasons for your response.**

It is sensible that all housing be built to a modern standard which ensures that the homes are energy efficient and properly insulated, reducing the level of household fuel consumption and saving residents money.

It is also right that all homes are built to the Passivhaus or similar Scottish equivalent to break the retrofitting cycle, new energy efficient homes built to a specified and internationally recognised standard are needed now to help the Scottish Government achieve its energy targets.

Q2. Do you think legislation is required, or are there other ways in which the proposed Bill's aims could be achieved more effectively? Please explain the reasons for your response.

Legislation will be required to ensure that the government and private developers are compelled to build to and meet the agreed environmental standards, having the standards outlined in legislation will also make it easier to enforce the proposed domestic building environmental standards.

Q3. Which of the following best expresses your view on setting the Passivhaus standard or a Scottish equivalent as the most appropriate new build housing standards to contribute to eradicating fuel poverty?

Fully supportive

**Please explain the reasons for your response.**

Ensuring that houses are efficient will help to lessen the costs involved with heating them in the colder months, this in turn will help to eradicate fuel poverty as residents will need to spend less to keep their homes warm. This is particularly the case with social housing being built to the Passivhaus or Scottish equivalent standard.

It is vital that a standard is set for domestic buildings to help Scotland reach its emission targets whilst also creating a better standard of energy efficient homes for the people of Scotland.

Q4. Which of the following best expresses your view on setting the Passivhaus standard or a Scottish equivalent as the most appropriate new build housing standards to contribute to a reduction in emissions?

Fully supportive

**Please explain the reasons for your response.**

Setting an environmental standard to which domestic buildings should be built will appropriately contribute to a reduction in emissions through the need for less fuel to heat homes, this done in conjunction with the introduction of more fuel efficient and greener technology such as heat pumps in older buildings which were not built to the same environmental standards will help Scotland accelerate its reduction in emissions and set a clear message for developers as to the seriousness that they must take with the environmental impact of their builds.

Q5. Which of the following best expresses your view of the process set out to ensure that the new standards are met in all new build housing? (see pages 14 to 16 in the consultation document)

Fully supportive

**Please explain the reasons for your response, including your views on how effective the process would be in removing the 'performance gap' and on how the proposed verification process might work in practice.**

It is sensible that the new standards follow a similar process to that which is employed for the current Scottish Standard. The introduction of an inspection of an accredited verifier as proposed under the Passivhaus standard will ensure that the new standards are met. It would make sense if the verifier was part of the relevant Building Control Department as it would ensure that the number of verifiers and their training etc. is maintained centrally avoiding any price increases that can be in place with contractors or an independent body.

The use of clear environmental standards such as Passivhaus coupled with the inspection will close the performance gap, as the PHPP is a very accurate tool for predicting in-use performance, the addition of an inspector will work to highlight any instances where the PHPP may have fallen short or the build process may have been lacking, ensuring that all homes are as efficient as they were intended to be and enabling developers to learn from any mistakes and update the PHPP if needed.

Q6. What could be the market effects of the introduction of this proposal?

In terms of market effects, the introduction of this proposal could lead to a reduction in the demand on energy to heat homes allowing residents to benefit more from having funds available to spend elsewhere in the economy outside of fuel.

#### Q6. What could be the market effects of the introduction of this proposal?

The introduction of this proposal could also lead to an increase in skilled jobs for those building and inspecting the new homes. Creating new opportunities for the people of Scotland to work towards a greener country with improved housing.

At present the number of houses built to the Passivhaus standard is relatively low on a European or even UK scale, if Scotland is able to get ahead on the building of more energy efficient homes, the skills learnt and knowledge gained could enable Scotland to be a leader in the field and ultimately the efficient housing market.

## Financial Implications

#### Q7. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

some increase in costs

**Please explain the reasons for your answer, including whom you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.**

Whilst costs would increase for the building of Passivhaus standard homes, these costs could reduce over time as the materials needed and practices used become standard leading to innovation in the market along with greater supply. There would also be an increase in costs to train and upskill workers to build and inspect the homes. Changing to a better world often takes investment and upfront costs with the reductions in costs being felt further down the line, this would be the same for these proposals, their introduction would add to the costs involved with building and inspecting the homes but the new homeowners / residents would benefit from reduced costs in their energy bills, this could create a benefit to local economies with residents having more income to spend elsewhere, add to this the reduced costs for heating the home over its lifetime would far outweigh the currently calculated costs of 4-8% on builds.

Ultimately the proposal is a spend to save approach, costs incurred upfront will lead to financial and environmental savings in the long term, of which the savings would far outstrip any costs borne at the outset. It is important that a long term approach is taken when looking at ways to improve the efficiency of homes, as has been shown, this investment can lead to savings in health services as residents of such homes are less likely to die or suffer health complications from the cold as they're able to keep their homes warm in an affordable manner, which in turn relieves stress and worries as they are able to afford to eat whilst those that are suffering fuel poverty would be putting their physical and mental health at risk and would be more likely to need to use the health service which in itself bares a cost to the public purse.

## Equalities

#### Q8. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

**Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.**

This law should have a positive impact on different individuals if it became law, as it would apply fairly to all.

## Sustainability

Q9. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas? If you do not have a view then skip to next question

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

The proposal would have an overwhelmingly positive impact on the work to protect and enhance the environment. Building new homes to the Passivhaus or Scottish equivalent would ensure that Scotland's new homes help the country to build towards a just society for future generations by reducing emissions and cutting fuel costs for residents and thus alleviating fuel poverty.

## General

Q10. Do you have any other additional comments or suggestions on the proposed Bill (which have not already been covered in any of your responses to earlier questions)?

*No Response*