

# 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.

an individual

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".)

Professional with experience in a relevant subject

Please select the category which best describes your organisation

*No Response*

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).

Andrew Arnott

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.

Partially supportive

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

I agree that passivhaus or very near equivalent (especially incorporating the exacting quality control standards of passivhaus) is highly important for new housing. I believe the same logic means it should be applied to all new buildings, and also that retrofits should be required to work to EnerPHit standard (the retrofit equivalent of Passivhaus).

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 is required.

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.**

Passivhaus has been demonstrated by many others (including Portsmouth and Exeter) to alleviate fuel poverty, while simultaneously addressing the climate crisis and also health and wellbeing issues (through better air quality)

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.**

Passivhaus building standards lead to massive demand reduction for energy - this is vital to our ability to cost effectively provide sufficient energy to heat our homes in winter from renewable energy sources. Passivhaus demand reduction also enables passive houses to switch off heating in response to stress on the grid without suddenly becoming very cold - they maintain their temperature very well without heat inputs. This helps reduce stress on national grids. Likewise, electrification of heat (necessary for emissions reductions) without investment in passivhaus measures to improve energy efficiency would lead to exceeding the capacity of the grid in densely populated areas - so passivhaus leads to reduced need for costly grid upgrades.

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)

Neutral (neither support nor oppose)

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

it would incentivise construction firms, supply chains and architects to up-skill to passivhaus standards - potentially making Scotland a regional or even global leader and centre for excellence.

## 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?

no overall change 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.**

for a new build it has been demonstrated by the passivhaus trust that large-scale passivhaus developments benefit from reduced costs of heating equipment and often reduced costs of construction

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?

materials due to the benefits of simplified designs (which are also more material efficient). This balances out any increase in costs associated with improved insulation and air tightness.

## 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.

Passivhaus dwellings have better air quality, and thus would benefit many people who suffer disabilities related to air quality.

## 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?

A recent publication by the Passivhaus Trust concluded that passivhaus dwellings can have comparable, or even lower embodied carbon emissions in their materials than standard housing, so good for sustaining a healthy environment. As noted previously, the air quality in passivhaus dwellings is better, which can help the health of disabled people as well as able bodied people. Social justice and equality is improved when social housing is delivered to passivhaus standards, meaning the poorest and most vulnerable in our society are not asked to live in housing which is cold, damp, expensive to heat and has poor air quality - not only that, but reduced heating bills allow those same individuals and families to spend more of their money on things other than heating, bringing their spending options closer in line with more affluent members of society and reducing wealth inequality impacts.

## 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*