

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".)

Member of the public

Please select the category which best describes your organisation

No Response

Please choose one of the following:

I would like this response to be published anonymously

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).

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.

There was a UK government plan for building standards to ensure 'zero carbon' homes by 2016. The failure to implement can now be seen as short sighted, both in terms of the energy cost crisis and the climate emergency. Alex Rowley is right to press for higher standards to be enforced now through the planning system so houses being built in the future do not have to be retrofitted with better insulation. There were those who thought higher standards meant higher build costs and were unprepared to support investment in better quality housing stock. ----- and others have shown that Passivhaus standards are compatible with affordable housing. If the standards Alex Rowley advocates are implemented, innovation and partnerships will be needed to ensure there are multiple players offering affordable solutions and providing the capacity for new build projects. That is surely achievable.

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.

There are no doubt ways in which the Scottish Government could implement increased standards for insulation in housing. They have had years in which to do it. The approach of successive governments

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has been too incremental and too slow. If there is a climate emergency then the Scottish Government must act on much higher insulation standards now or allow the PDBES Bill to go ahead.

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 houses require very little heating at all. The highest standards of insulation are required to tackle both fuel poverty and the climate emergency. The standard can be achievable in affordable housing ref -----.

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.

See previous answer.

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.

The proposed inspection and verification processes for Passivhaus are absolutely key to ensuring that houses are built to the correct standard so that they will perform to the Passivhaus requirement. The actuality of current building practices do not always meet the requirements laid down in the building warrant standards and cannot be expected to perform as required. It is important that the Passivhaus standard be accompanied by improved inspection and verification processes

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

The proposal would create the requirement to improve standards and operating procedures in the building process. Training would be needed and could be provided by expanding the skills of existing training organisations. Collaboration of builders with companies proven able to meet Passivhaus standards might be one way the skills could be developed and promulgated.

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?

a significant reduction 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.

The long term benefits in reduced energy consumption and avoided CO2 emissions will be very significant. Companies like ----- have shown the build costs for Passivhaus can be affordable.

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.

Warmer and more comfortable, affordable housing with ultra low energy costs will have benefits to all groups including all those you list above.

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 will reduce environmental impacts from emissions and be a step towards a more sustainable economy with benefits for our collective efforts to tackle the climate emergency.

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