

# 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

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".)

**Optional: You may wish to explain briefly what expertise or experience you have that is relevant to the subject-matter of the consultation**

Architect

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

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.

Yes, legislation is required. We need to have passive house standard as minimum to meet climate emergency targets. We should not be leaving a legacy of housing that needs upgrading in 5 or 10 years time as that is not resource efficient, wasteful and increases embodied carbon. We need to build in a way that is good for forever and have longevity in mind, not profit.

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.**

If we build to a high standard (less leaky and better insulated homes) then the energy demand will also be lowered therefore less reliant on fuel to heat homes. It would be best if we can build in a way that zero heating is required for homes - that is BETTER than passivhaus. then the energy bill will be zero and the carbon emission will also be much lower (only electrical load for gadgets/ cooking)

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.**

I believe that apart from Passive House we need to achieve low VOC and healthy buildings at the same time in order to reduce emissions properly. Plastics (insulation) and toxic elements (most paints and carpets) in the building have embodied carbon and forever toxic chemicals. These should also be tackled by limiting toxic release, emissions during production and embodied carbon limits. This is because we need to care for the biodiversity as well as occupants and energy in use. Embodied carbon and toxicity regulation should go with this hand in hand. Scottish regulations should do better than just passiv haus.

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.**

Training of the professionals, construction workers will be essential. The Scottish government should also train consultants/ architects to verify the standard of build to help verifiers as well as construction workers to know what they are doing and looking for during the build process.

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

Can be very positive, more skilled workers trained, better trained verifiers, consultants, and if VOC and embodied carbon is also regulated then it would promote the right products be used effectively for healthier environment, lower fuel poverty, less waste in the construction industry due to not needing to retrofit every 5 years. There is a huge task ahead of us already having to retrofit all existing buildings already, we do not need to add to our workload to having to retrofit new built buildings as well. There is plenty of work required and more demand of such skills that hopefully the government will help fund and train will be required.

## 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 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 increase in capital cost to build a passive house as opposed to a normal current building standard requirement house is 6%. The embodied energy and waste to retrofit is 20% of the original build, in addition every 5 years. The increase to energy cost recently is 110% - bills have more than doubled in April to reflect market costs and that is only going to go up as resources is more and more scarce. The on going operational cost being reduced, retrofit cost that is not required therefore is far greater than the initial small increase in better specification. This ought to be a no-brainer!

## 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 will create a healthier better living environment for all. We all want to live in a warm comfortable house, no matter your age, disability, gender or orientation. The right to live in comfort, the human right to not live in fuel poverty, equality and justice to all should start from comfortable housing.

## 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?

This proposal is the first step to protect the environment. It does not enhance the environment because it does not seek to legislate embodied carbon or limit the use of toxic forever chemicals or VOCs that damage human and planetary health. It does however lower fuel consumption, improve human comfort for better living conditions in society for future generations.

## 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)?

This legislation must be adopted as the first step to climate emergency and climate justice, equality to all for a comfortable living environment. It would be wise to seek further legislation to adopt limits to embodied carbon, ban plastics and toxic forever chemicals, VOC emitting products to improve occupant health and planetary health. This is a great bill, but cannot be stand alone on its own, this bill must be supported by the others if we are to meet IPCC targets and pledges made at COP26.