

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
Energy and Sustainability Professional

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.

We need low energy - nearly zero energy - houses built in order to meet the Climate challenges we face. We also have a need to provide low running cost houses to bring people out of fuel and food poverty in Scotland. Providing a healthy environment for people to live in to improve not only mental wellbeing but health on the whole. We see many cases of poor homes leading to many health conditions and increased pressures on the NHS. This building standard will help SG to meet the climate targets, create low carbon homes, and improve the health of their inhabitants

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 - even current building standards are not adhered to, as they are pushed down the road, and house builders are not adhering to these straight away. There needs to be strict laws stating that from x point forward we will build to this standard. Without this, then builders will not do so.

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.

This standard will go a long way to assisting with fuel poverty if it can be brought in. Achieving 15kWh/m² for heating and cooling will be key in doing this. If the standard is coupled with onsite renewables, or local tie in with wind turbines, or a local renewable energy scheme which would result of the homes being built, then real net zero carbon homes could be built.

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.

Since the EU 2019 / 2020 law to build nearly zero energy homes, this has all but been pushed down the line, and the current standards (new home standards) fall short of where we need to be right now. We should be building for the future now, not pushing the can down the road.

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.

I would even add in embodied carbon targets here to ensure this is addressed, not only with low energy targets to meet. An emphasis on natural non toxic local materials should also be considered here when building, helping to improve local construction businesses within Scotland keeping things local, and developing the skills within the country. I would also encourage the use of over heating modelling work against TM52&59 looking forward to 2080

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

Help to build a more educated work force in the building industry. Improve material quality and stores in Scotland and to train and qualify more people to build to this standard.

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.

The trouble is in today's market, materials and goods are difficult to source and purchase, and the costs of wood for example is hugely inflated than it was a few years ago. There needs to be a potential low cost construction method evaluation to public housing looking at the use of containerisation where the house can be built in sections and then quickly put together on site, to reduce costs, and the build teams can work comfortably indoors. This will help increase the average age of builders as well, since working in the harsh scottish weather is not great once your reach over 50.

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.

An EQIA assessment will need to be carried out on the bill, and the results considered

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?

labour markets will be impacted - college training to build to the standard will be required - designers and builders need to be educated on the PHPP and overheating guidelines - markets will need assessed for materials and low embodied carbon assessments should be carried out - a creation of a more circular economy should also be a key part of this work, and thoughts around where materials can be stored to reuse them for future buildings as there is a large shortage of storage for materials at present, which hinders the circular economy and the market place to provide low carbon materials

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)?

Embodied carbon targets to be included as part of the bill - On site renewables to make the homes net zero carbon (passivhaus plus standard)