

# 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".)

Academic with expertise 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**

I trained in ----- (BSc Hons have worked in environment linked jobs for most of my working life. I have a long standing interest in sustainable living.

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.**

Climate change is at a critical point and we need to do as much as possible to reduce the impact. This proposal takes us in the right direction. As well as reducing energy use it will reduce energy costs, at a time when these are causing extreme stress to many.

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.

While discussions and voluntary codes are important, ultimately if there is not legislation to back this up, it is unlikely that all developers will invest in this approach.

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.**

It is good for the planet and for people. The reduction in energy use, will reduce our carbon footprint, but is also a good way to reduce people's living costs - particularly those experiencing fuel poverty.

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.**

As highlighted in the paper - it is far better to reduce our consumption of energy as much as possible - for the planet and people's purses - than to try to find huge quantities of renewable energy to meet high demand. (We need renewable energy - but without energy use reduction - it will not be enough to create the change we need.)

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)

Partially 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 think the process as described seems fine, my only concern is, that while good standards need to be met - if the process involves huge consultation costs, large quantities of paperwork and bureaucracy and is not flexible enough to accommodate local differences - it may prove difficult to implement. Simple and flexible systems would be my first choice.

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

I don't know, I'm not an economist. But I imagine good quality housing stock may be more costly to produce and people may choose to stay in their house rather than move - but ultimately this is what we need to live sustainably - so maybe our market models need to change to reflect longer term aims and benefits, rather than short term gains.

## 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?

Don't know

**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.**

How this proposal is funded is complex and some of it will depend on the political direction of the party in power and how they want to fund it.

## 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.

Housing could be built in consultation with prospective tenants - to incorporate their priorities and needs. Good living spaces can help both individuals and communities and the people living in the communities are the best people to comment on their needs.

## 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?

Yes, all of these. Sensitively built housing, taking on board the needs of individual communities, local biodiversity and joint community needs - could be both positive for people and environment. Shared communal facilities could further enhance the sustainability aspects of such projects, along with the low carbon passive housing.

## 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)?

It was mentioned in the paper about focussing on new housing and I understand that it can become too large to think about existing housing within this paper too. But, I think this is an equally important aspect of sustainable housing and would merit a companion paper on this topic. I assume the amount of existing housing stock in Scotland that is well below modern energy efficiency ratings, must be extremely high. While there have been schemes to improve this - they seem to come and go and many are not affordable for the many in income brackets that don't involve benefits, but don't have the kind of disposable income that would allow for solar panels or air source heat pumps, cavity wall insulation etc. Many of these households want to improve to their energy efficiency but don't have the finances to do it. They continue to pay extortionate bills - costing individuals a lot of money and costing the planet - in terms of climate change. I would like to see a nationwide scheme to gradually improve all housing stock to basic standards of insulation and support to fund renewable sources of energy - either via individual households or via local community schemes run to provide low cost energy for local communities.