

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.

I am absolutely thrilled to hear this is even being considered. Well done for that.

I expect there will be backlash from housing developers as building houses to the Passivhaus standard or equivalent will cost them more money as they will be expected to build a better quality of house. The local councils also initially may also not be keen on the idea for any new social homes they are required to build but if it means residents on low income/benefit will require less financial support with heating bills moving forward, local councils should be encouraged to see this as more of a long term investment (particularly in Scotland with colder temperatures than elsewhere in the UK). Not to mention the benefit it will have for reducing the demand on healthcare services as Passivhaus homes are naturally healthy homes.

This is what the public wants - we don't want cheap poor quality and inefficient homes that are just about meeting building regulations that these big housing developers keep building - this is evidenced in the quality of self-built homes we see. A complicated planning system and reluctance for lenders to finance self-builds are the main reason why more people don't build their own homes.

I hope for a future where all new houses are Passivhaus homes. I hope for a future that is carbon neutral. I hope for a future where climate change is no longer an issue. And as a young person, watching policies that shape my life be created by older and less environmentally passionate generations, I have spent my 26 years just hoping for "a" future. Be an example. Do the right thing.

Q1. Which of the following best expresses your view of the proposed Bill? Please note that this question is compulsory.

One final note - for more success behind sustainable housing - the public need to be more educated. I am a trained Science teacher and can tell you we teach about solar panels at school but that is as far as it goes for sustainability. Children are not educated on fabric first, there are many preconceptions regarding timber frames houses and the average family would do all of the wrong things when living in a Passivhaus (ie open windows when it's hot and drill holes through insulated walls). Passshauses are a no-brainer in my opinion and raising general awareness within the public on these topics will create a more natural demand for sustainable housing - putting pressure on local councils and housing developers. Because despite me having my fingers crossed for this to become law - it's probably not going to happen.

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.

The first book I ever read on sustainability was actually published in 1980's. Outlining issues that in the past few years have only been accepted outside of the scientific community and become general knowledge to the public. Creating a more sustainable way of life is something that we cannot wait to just filter down naturally in order to create change by a supply-demand shift from the bottom up. We do not have time. Nor can we expect building developers to not try and squirm their way (and do the bare minimum) of any other "guidance" that has been set out. The Passivhaus standard is a very black and white way forward. It is the only way to prevent greenwashing of "sustainable housing". It is the only way to protect buyers with good intentions that they are getting a sustainable home without them needing a degree in the subject to understand what they are being sold in a new house. Cut the --, stop beating around the bush and just make it law.

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.

The Scottish Parliament is obviously already aware of the Science otherwise I doubt this would be considered. I don't understand what else you need? Let the evidence talk. If you do not push this responsibility back on to people building the houses you will be picking up the pieces forever by offering grants for insulation/ solar panels etc and having to give low-income people direct financial help. Fuel poverty is not going to go away - it's only going to get worse.

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.

We cannot compensate for the poor quality of current housing by scattering a few solar panels on suitable housing. Fabric-first approaches are the most effective way to reduce emissions. It is also worth bearing in mind, that as the world gets hotter people may become less dependent on heating homes as much in the winter - but colling them in the summer. Passivhaus approach tackles both of these issues.

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.

It's a little vague however I suppose it is an overview and would not be worth going into further detail on the process until the bill has been approved. Looks like a good outline, as long as loopholes are identified early on - I feel more confident of the Passivhaus route because I know how thorough their process can be and would imagine that an alternative provided by the government would be less so.

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

I don't really understand this question - do you mean the affects on the housing market? Well, initially less housing is being built as people adjust to new skills (tradesmen will need upskilling - this is something the government may need to help with prior to legislation being put into place with free training courses etc). House prices will also go up as they are more expensive to make however you'd hope over time as businesses that focus on sustainable housing grow with the demand that prices come down (like we have seen with solar panels). Some businesses/developers that aren't clued up on any sustainable methods at all may be out-competed - although I would argue this is a good thing. However, it would help grow the sectors of renewables / MVHR etc. Despite all of this, I think the advantages by far outweigh the disadvantages. We must see better quality housing as an investment, despite the temporary higher upfront cost.

I don't see what the other alternative is - we continue to build the same poor-quality homes we are now?

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.

Building developers would be out of pocket. However, their current cheap houses cost their residents and local council (in regards to financial support) an absolute fortune to run. The fact we have continued to let the public suffer with the outrageous costs of running these homes, often supplemented by benefits (taxpayers' money) while multi-million pound companies reap the profits is disgusting and highlights how the government will always favour the wealthy over the average person.

Here is my answer to the previous question where I kind of answered this one -
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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?

I don't see what the other alternative is - we continue to build the same poor-quality homes we are now?

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.

Sustainable housing creates a fairer more equal world and helps to remove inequality. If you look at the % of groups living in fuel poverty / poor quality houses / social housing / cannot afford to pay for solar panels insulation themselves, you will find more minority groups.

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?

It positively impacts every single one and with the amount of scientific evidence available, I honestly don't understand how someone could think otherwise. In regard to the economy in particular - we are on the edge of a global recession (some countries are already knee-deep) which has been massively contributed by the war in Ukraine and Russia. But more importantly, the dependence we have on other countries for fuel. Reduce the need to fuel consumption, and reduce the impacts of external global events.

In regards to the future generations - please keep this as a focus. It is a flaw of the human race we have chosen most of our actions based on short-term benefits and ignored long-term consequences. Look at where this has got us so far in regards to creating a healthy planet to live on the future generations. Do not keep making the same mistake. Suck up the short-term disadvantaged for long-term benefits otherwise, the quality of life for your grandchildren will be pretty grim.

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)?

Only what I previously mentioned is a need to educate the general public on what really makes a sustainable home, point them in the right direction for reliable information, and how to live in a sustainable/Passivhaus home - when to open the windows and not to drill through insulation. This way if and when the bill doesn't pass - hopefully, you will see more consumer demand putting pressure on local councils and developers... because the only people that seem to be putting pressure on at the moment are school kids protesting - makes sense why they'd care more though, they've got longer left here than us.