

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

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 have designed, built and live in a property to near passivhaus standard and designed and built another to full passivhaus standard.

Please select the category which best describes your organisation

No Response

Please choose one of the following:

I am content for this response to be published and attributed to me or my organisation

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).

Anthony P Hadley

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 have the ability to build houses that are truly 'affordable', that are inflation proof against the rising cost of energy.

If the standard was adopted homes would cost no more than 10% to build, but the savings in energy costs would last the life of the home.

The improvement in air quality would create a healthier environment for the residents.

The Passivhaus standard is not prescriptive in build style, it is a method of measuring the real energy performance of a building.

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

It puts Fabric First, negating the need for bolt on technologies.
If adopted it will transform the new housing stock in Scotland.

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.

I feel legislation will need to be implemented.
House building companies and developers are purely focused on the bottom and their shareholders.
The carrot and stick approach could be an interim measure, with say a 60% reduction in council tax on the new build property, but that would put pressure on the local authorities and they would need reimbursement for the loss of income.
Another possibility would be to substantially increase the fees of building warrants for any property not conforming with the passivhaus standard until legislation is enacted.
Also worth noting is builders with historic building warrants on large developments are more than happy to continue to build lower standard houses for years to come !

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.

I am fully supportive of adopting the Passivhaus standard, which has stood the test of time.
I am not in favour of a Scottish equivalent, which could be whittled down as and when Politicians feel the need to pander to lobbyists.

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 my previous response

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)

No Response

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

New builds would be seen as more desirable due to their demonstrable energy credentials.

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 financial implications are twofold:

A comparative, small increase in building cost which would impact on the cost of a new house.

A dramatic decrease in running costs of the property.

Lower energy bills, these savings would become more apparent against energy prices continue to rise.

Lower running costs in not needing an annual service to the central heating, nor the need to replace boilers after 10/15 years.

A cost benefit/loss calculation would clearly show the extra build cost would be recouped within 10 years.

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 new law would have a positive effect on all groups of people through lower energy bills and improved air quality.

Trying to link the impact to the individuals mentioned is just pandering to woke.

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?

Reducing the energy requirement of new buildings will enhance the environment we live in

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)?

The long overdue adoption of the Passivhaus standard in Scotland will send a strong signal that we are taking our long term obligations to climate change seriously.
But we need to act with a degree of urgency. If we are still debating this in 5 years time, we will be failing our future generations, our citizens, our country and the planet we call home.