

Proposed Domestic Building Environmental Standards (Scotland) Bill

Barratt Developments PLC Draft Response – July 2022

1. Which of the following best expresses your view of the proposed Bill?

Partially opposed:

We fully support the move towards Zero Carbon and acknowledge that energy efficiency enhancements will assist in us achieving this. However, we are keen to express that proposed Bill highlighting a requirement for the design to meet Passivhaus standards or a Scottish standards equivalent to Passivhaus energy efficiency and thermal performance standards is a big step change for industry, not just in the way that we build, but the way our homes look and our customers use them.

Introducing additional standards and verifying processes that have not yet been rolled out in volume within Scotland across standard housetypes adds both uncertainty and complexity. We would question if there are enough suitably qualified people who are or who could become verifiers of such a standard and will these be competent?

Another concern by moving towards such a prescriptive standard is the lack of flexibility in design, materials and components used. We are already seeing issued associated with lack of skilled labour and material shortages, such as standard is only likely to enhance this. We need to ensure that the manufacturers have capacity to deliver, that trades have the skills available to construct and install products/services and that any technologies that are not yet proven are trialled before volume roll out to avoid any customer issues. Such a Bill is extremely ambitious and we would recommend further work is needed to understand the true implications of introducing such a standard. E.g. will the appropriate technologies be available for implementation, what is the overheating risks associated and are our customers (the homeowners) ready for these changes?

We believe it is key that we have incremental step changes in carbon reductions to reduce the risk of noncompliance and customer care issues.

2. 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.

No additional Legislation is required:

We don't believe additional Legislation is required. As we do currently, changes in Standards should be consulted on and mandated through the Scottish Government Building Standards Division.

3. 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?

Partially Supportive:

As a business we recognise that following the energy hierarchy, which is maximising the potential savings using energy efficiency and conservation measures which has no reliance on external factors, presents the optimal method for reducing energy demand and thus carbon emissions overall. Focusing efforts on long-lived building fabric helps to 'future proof' homes meaning they will be less likely to require difficult and expensive refurbishment upgrades at a later date. This supports the parallel agendas of carbon reduction, long term energy security and reducing fuel poverty. However, this will only scratch the surface

of eradicating fuel poverty and reducing carbon emissions from buildings given the majority of occupied homes are made up of existing older housing stock.

Furthermore, we do have concerns over the in use performance and effectiveness of certain building services and systems. Lack of consumer knowledge and understanding on how to run a low carbon/passivhaus home can lead to operating and running inefficiencies which can in turn impact the energy consumed and cost to the end user. With the introduction of higher standards homes become more complex so we need to be able to support customers, education is key to ensure they understand and know how to run their homes efficiently.

4. 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?

Partially Supportive:

As per response set out in question 3

5. 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 above)

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.

Fully Supportive:

We believe that it is fundamental to remove/reduce the gap between design verse as built to ensure the standards are met and homes have optimal performance. Introducing verification processes is in principle a good idea. However, as this is not a current process in Scotland, consideration needs to be given to the difference in approval processes in Scotland and understand the capacity for the supply chain to deliver. There is not currently a large pool of registered Passivhaus Designers for Scotland so inevitably there would be a resource issue and therefore we would question if additional verification processes would cause potential issues on site in terms of delaying legal completions etc...

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

We would likely see a reduction in the delivery of new homes across Scotland. This is due to:

- The lack of knowledge associated with building to such standards. Further trialling and testing and is paramount.
- Designs standards limiting design flexibility
- Lack of product innovation
- Huge shortage on both materials and skills in the sector
- Grid capacity

7. Any new law can have a financial impact that would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

We acknowledge that enhanced standards are going to come with increased capital cost. However, from recent cost modelling completed for the recent Scottish Government Consultation for Section 6 Energy, it was highlighted that for reducing carbon emissions by 57% would see cost increases to the developer

of in excess of 15% on constructing to current 2015 Building Standards. Therefore, building to further enhanced standards above and beyond this will see additional increased in build costs.

These costs do not account for rise in material and labour costs that we are currently seeing. Likewise they do not account for any non-productive costs that may occur due to the unknowns of building to a new standard without having completed a robust process to review, trial, monitor and feedback.

8. 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.

No comments

9. 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.

No comments

10. Do you have any other additional comments or suggestions on the proposed Bill

- There needs to be a bigger drive in customer education, innovative products and skills. As previously mentioned we need to be able to support customers, education is key to ensure they understand and know how to run their homes efficiently.
- There is also a lack of product innovation and huge shortage on skills in the sector. We need to do more to bring through the younger generations into our industry.
- Engagement, collaboration and sharing knowledge across the sector is going to be fundamental in improving both the delivery and performance of homes in Scotland.