

# 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.

on behalf of an organisation

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".)

*No Response*

Please select the category which best describes your organisation

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

**Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).**

Our aims are - The advancement of citizenship and community development; The advancement of environmental protection and improvement - and one of the key projects we are working on is 'Retrofit Strathaven' - which will improve the quality of local homes, including better insulation, reduced fuel costs and address fuel poverty, which can affect up to 20% of homes - this is a project supported by the whole organisation

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).

Climate Action Strathaven

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 been lobbying our local, regional council and national officials along the very lines of this report both as an organisation (since 2019) and as individuals for many years

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.

We believe that legislation of the type proposed by this bill is required as the results from self regulation undertaken by nearly all contractors falls far short of what our nation deserves

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.**

There is no reason in this world not to - it is a fully verified and sensible method of working which brings the results that are required to keep everyone safe for the future as the reductions in energy use bring everyone's bills back to a liveable level

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.**

There is no reason in this world not to - it is a fully verified and sensible method of working which brings the results that are required to keep everyone safe for the future because of the huge decrease in energy usage thus the huge reductions in CO2e

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.**

The key aspect is the independent verification of the work done allowing contractors to prove and feel justifiably proud of the work they have done to ensure all our citizens can live sustainably for the future

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

Lifetime costs of Passivhaus new build are considerably lower than that of various traditional methods even over only 30 years. The same situation is encountered for retrofit. Consumers are going to be requesting these solutions more and more in the market as the price of energy is only going to rise in the years to come not fall. We need, as a nation, to consume less energy coupled to the move towards renewable sources of energy and partly this will be driven by the housing sector.

## 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 reduction 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 main beneficiaries are the owners of the properties but also the competent construction sector as their profit margins will likely increase as people see the benefits and advantages of utilising zero carbon solutions and see the advantage of using efficient and capable tradespeople. The clear way to cost effective delivery of the proposal is via training of competent builders to ensure that the opportunity to have Passivhaus and EnerPHit is available to as many people as possible.

## 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.

*No Response*

## 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?

I cannot understand why anyone would be negatively impacted by this proposal - how can reducing fuel poverty, improving air quality, equalising opportunity (via social housing having the proposal applied) and the many, many other benefits of our citizens living more sustainably be anything but positive

## 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)?

I am sorry that my responses are not as factual as I would like but these all these varied and extensive aspects have been covered by many others far more qualified than myself, and incorporated in the proposal, as far as I can determine. There is no reason why this proposal should not be implemented ASAP apart from vested interests in the humanity limiting 'status quo'