

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

A qualified architect, a Certified European Passive House Designer, Lecturer in Architecture and the Environment, Developing a new course in Retrofit for professionals at Robert Gordon University

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).

Gillian Wishart

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.

For all the reasons in the briefing document - meeting carbon reduction commitments, reducing fuel poverty, avoiding the need for retrofitting buildings built today in future (when we know what is required now and how to do it), reducing our national energy demand, avoiding building in fuel poverty as we move from gas across to electricity in the next decade, improving the health and well being of occupants,

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.

Legislation is definitely required to ensure that the standard is reached and to stimulate the development of skills in this area. As we all know there is an urgency - We are in a climate emergency - we are not acting fast enough, mandating the standard will give clarity to the industry and set a level playing field for all developers with no temptation to cut corners or to see energy performance as an optional extra. It's an easy win in climate action and fuel poverty.

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.

This is a proven standard with comfort at its core and massive energy reduction guaranteed. It is the standard that guarantees performance in practice.

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.

It has comfort at its core, and guarantees massive energy demand reduction in practice giving wins in climate action/carbon reduction, health and well being, reduction in fuel poverty and social justice. It is future proofing our housing stock and economy.

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

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

The housing construction industry will fully modernise and upskill to deliver the standard. Currently there is a very small additional margin of cost to achieve the standard but as the industry becomes more familiar with design and construction to the standard these extra costs will be eliminated. Additional costs is sometimes used as a reason NOT to introduce the standard but there is an element of costing the unknown whereas in actual fact the detailing design and construction becomes simpler when the standard is understood.

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.

There may be some increase in costs of construction initially for reasons set out previously. However these will come down (as explained before) and the costs need to be seen in the context of the cost of occupying the buildingenergy demand is drastically reduced so operational costs going forward are greatly reduced. Perhaps the initial construction costs could be covered by energy savings in occupation in the first x years - a more intelligent finance model?

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.

The proposal can only be a positive thing in relation to diversity in society as the energy demand is drastically reduced, the cost of staying warm and healthy is much less dependent on income.

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?

The bill can only have a positive impact on the environment by reduction in energy demand and therefore carbon emissions and the need for ever more infrastructure, it directly contributes to a sustainable economy, and as before the cost of keeping a warm and healthy home is drastically reduced taking income out of the health equation.

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)?

This is an essential step in the transition to a net zero economy that we are committed to, by law.