

# 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 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).

Stuart Rennie

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.**

True sustainability has to start with reduction in the amount of energy required for comfortable living. In the case of domestic dwellings, this can only be achieved through imposition of minimum standards for glazing and insulation. Current standards are woefully inadequate.

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.

This can only be achieved through legislation. The construction industry will undoubtedly complain about impact on house sales. However, it would be a simple matter to demonstrate the time period for savings in reduced fuel bills to exceed any increase in house cost i.e., 'payback time'.

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.**

With a suitably stringent standard dramatic decreases in domestic energy costs can be achieved. Such measures cannot easily be retrofitted. Incorporation of required levels of insulation is far easier and much cheaper to install as part of the construction process.

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.**

Such a standard, if applied nationally, would actually enable several power stations to be mothballed.

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)

Partially 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.**

I believe the building standards Technical Handbooks urgently need to be reviewed and revised. Frank - and speaking as someone with first-hand experience - some of the standards look like they've been written by people with good theoretical knowledge but no practical experience. They look like they've been written by well qualified interns with no appreciation of the practicalities. So, I agree with and support the process, but it should extend to a review of the trechnical handbooks. And by 'review' I do not mean relaxation of standards.

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

The 'development' industry will bleat and wail about commercial impact, i.e. house prices being pushed up. These people are the same dinosaurs who have delivered houses with the absolute bare minimum - if that - of energy efficiency measures for years. Buyers are more environmentally savvy than they have ever been and are struggling in the current financial climate. Purchasing a 'green' dwelling enables buyers to a) make a contribution towards meeting personal and national energy efficiency and CO2 reduction targets, AND 2) reduce their energy bills. Any even half-decent salesperson should be able to sell this win-win combo. If not, perhaps they're in the wrong job!

## 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?

a significant 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.**

I do not know the modern construction industry well enough to know how to deliver changes more cost effectively. However, if they can be persuaded to take off their blinkers, construction industry managers will see that the proposal is cost-neutral to cost-positive (more profitable) for their operations. It cannot fail to significantly reduce costs for home owners.

## 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?

This proposal cannot fail to aid ScotGov in its efforts to "...protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations."

## 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)?

Good luck!