

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

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).

Wolfgang Feist

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

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 required. Reason: A change in the quality of construction is needed in order to mitigate and react to climate change. This can be done by the proposed measures.

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.

All know-how for that is available, products can be produced in Scotland, the effect is huge (sustainable

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?

energy systems will become possible), the additional effects like avoiding even more fuel poverty, creating additional employment, improving education are all positive. The additional effort can be kept low.

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.

Passive house is very flexible with respect to building type (SFH, block of flats, ...) and material (all construction methods possible).

It can be realized using Scottish resources. It's an open standard, no patent fees whatsoever. Guidelines are freely available. There are several independent not for profit organizations, which can assist (like the Passivhaus Trust). Examples have been built in Scotland and the experience is available (esp. from Glasgow). Education is available and can be delivered fast.

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.

Information and education is key. That is indeed part of the proposal. Certification is a path to avoid "deep state" control; there should be several competing certifying bodies to keep the costs low - and there are. Although, the certifiers must be held accountable. There could be further reduction of cost by introducing fast internet based tools for certification.

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

Development of even further improved building components from Scottish producers. Reduction of cost for components for heat-saving retrofit of existing buildings, too. Reduction of the increase in oil and gas consumption.

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 understand cost here as "life-cycle total cost". Energy efficiency measures pay for themselves by the

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?

energy costs they save. For PH components the state of the art results in 4 to 8 Cent/kWh substitution cost for heating energy on the consumer level. This is far below any future cost of alternative heat delivery for a consumer, fossil fuels included even without their environmental costs.

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 create opportunities for each of the mentioned groups; on two levels: 1) the buildings constructed will provide comfortable living conditions (even in a case of crises) 2) the components needed can be produced by manufacturers, which especially create employment independent of the different groups in society. (e.g.: heat exchanger production by teams of educated disabled persons; this is only just one example)..

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 is a sustainable construction standard. I.e.: Everybody on planet Earth could live in this way and renewable natural resources will still be sufficient. The result are longer lasting buildings making refurbishment less frequent and less expensive. The energy demand for heating is close to zero and can easily be provided by renewable energy from Scotland, even if everybody would require such energy.

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)?

You can contact me and we might be able to further assist in measures to make this approach a success..