



## Stop Climate Chaos Scotland

### Response to Scottish Government consultation on Building Regulations, April 2013

Stop Climate Chaos Scotland (SCCS) is a coalition of organisations campaigning on climate change, including environment, faith and development organisations, trade and student unions and community groups. We have limited our consultation response to [question 1](#) as we consider the remaining questions to be outside our area of expertise.

Stop Climate Chaos Scotland disagrees with the proposals to deliver a 60% reduction in CO<sub>2</sub> emissions from non-domestic buildings and a 45% reduction in CO<sub>2</sub> emissions from domestic buildings compared to 2007 standards. We believe the Scottish Government should aim to **deliver a 75% reduction in emissions from non-domestic buildings and a 60% reduction from domestic buildings compared to 2007 standards.**

We believe the current proposals are insufficiently ambitious and will leave a significant gap in the Scottish Government's delivery of the emissions reduction targets set under the Climate Change (Scotland) Act 2009. We note from the draft second report on proposals and policies (RPP2) that the revised proposals leave a gap of approximately 90 ktCO<sub>2</sub>e in 2020 compared to the proposals set out in RPP1, which were based on the agreed Sullivan recommendations<sup>1</sup>.

Reducing emissions from new buildings is one of the easiest and cheapest ways we can tackle climate change emissions. It would be far more costly and difficult to set unambitious standards which would require these buildings to be retrofitted at a later date.

Setting ambitious but achievable energy standards in building regulations has numerous wider economic, social and environmental benefits which have not been sufficiently addressed in the regulatory impact assessment accompanying this consultation. For example, studies have shown that living in more energy efficient homes leads to a reduction in health-related problems for the occupants, which will lead to a reduction in demand on the NHS. Likewise living in a more energy efficient home improves the mental health of occupants, leading to a reduction in demand on the NHS and an increase in economic productivity.

In addition, we call on the Scottish Government to:

- introduce any changes to regulations before the end of 2013, as previously agreed in the Sullivan report.
- consult at an early stage on the 2016 changes to building regulations to deliver zero-carbon new buildings, as previously agreed by the Sullivan report.
- take further action to tackle compliance with these regulations.
- expand its limited consequential improvements scheme introduced under the 2010 changes to regulations, which require those undertaking major extensions or refurbishments to improve the energy efficiency of the existing building.

For more information please contact:

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**Stop Climate Chaos Scotland is a charity, registered in Scotland**

<sup>1</sup> Scottish Government (2013) - *Low Carbon Scotland: Meeting our Emissions Reduction Targets 2013-2027*  
*The Draft Second Report on Proposals and Policies, Annex A, 163-4*