

Building Standards  
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*[Sent by Email]*

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Our ref: FP/Leg/Sec/Consult

Your ref:

Date: 3 December 2010

Contact: David Jennings  
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Phone: 01224 628210

Dear Sir / Madam,

### **Consultation on Sustainability Labelling within Building Standards**

Thank you for the opportunity to comment on the above consultation document.

The Aberdeen City and Shire SDPA was established under the Planning etc (Scotland) Act 2006 primarily to prepare and keep under review a strategic development plan for the North East of Scotland.

The area's current [structure plan](#) contains targets in relation to the use of water saving technology as well as moving towards zero carbon standards for new buildings, with local development plans and supplementary guidance identified as mechanisms through which they can be delivered. The current consultation has the potential to facilitate the delivery of these targets by putting in place a mechanism and consistent standards against which new development can be assessed.

As a consequence of the remit of the SDPA, this response only relates to the principle of sustainability labelling and its relationship to the planning system and does not address matters of a technical nature around the standards themselves or their verification.

The SDPA's response focuses on four main themes – the division of responsibilities between the planning system and building standards; the value of the current proposal in improving consistency and efficiency; the need to ensure the highest ('Platinum') level of sustainability meets high standards across the eight criteria; and the need to ensure water efficiency measures are included in the criteria for non-domestic buildings.

- 1) The current division of responsibilities between the planning system and building standards in relation to energy efficiency is confusing and inefficient. The Climate Change (Scotland) Act 2009 has further muddied the relationships and any forthcoming primary legislation in the area of climate change should seek to rectify these difficulties (particularly the requirements on local development plans found in s72 of the Act).

- 2) However, the proposed sustainability labelling outlined in the current consultation does represent a positive step forward in relation to ensuring a level of consistency across Scotland which must be to the benefit of the private sector but also result in increased efficiency in the public sector. The voluntary nature of the scheme will help to limit costs in a difficult financial climate for the development industry.
- 3) As the scheme is currently set up, it appears to be possible to gain a 'Platinum' standard in a domestic building on the basis of it being zero carbon and yet not exceed existing standards in any other aspects. It is suggested that the attainment of the Platinum standard should be based on meeting the 'Gold' standard and the extra requirements in relation to carbon dioxide emissions contained in the 'Platinum' standard.
- 4) As currently set out, the proposal is that non-domestic buildings would only be assessed against the criteria for carbon dioxide emissions. Little justification is given for this position but it is important that at the very least, water efficiency criteria are added, even if these only relate to the 'office' or domestic type elements of a building.

The SDPA would like to take this opportunity to support the introduction of water efficiency into mandatory Building Standards in the 2013 revision. Not only does this make sense from a climate change perspective (addressing both adaptation and mitigation) but also it will help to facilitate development and protect valuable water resources. The arguments in favour of its inclusion are strong and it is hoped that progress in this direction can be made as soon as possible.

I have enclosed a completed respondent information form to accompany this response.

Yours sincerely,

David Jennings  
Strategic Development Plan Manager