



Banks Developments

Property.Energy.Waste.

CONSULTATION ON PROPOSALS FOR A SCOTTISH CLIMATE CHANGE BILL

CONSULTATION RESPONSE

1 INTRODUCTION

- 1.1 Banks Developments welcome the aim set out by the Scottish Government to reduce our emissions by 80% by 2050 in order to ensure that climate change is minimised. As a company we realise the challenge of climate change and recognise that something has to be done now before it is too late. The introduction of a Scottish Climate Change Bill is an important step as it will allow a framework to be established that will drive the efforts to tackle climate change in Scotland.
- 1.2 Although Banks Developments welcome the proposed Bill and the Scottish Government's commitment to reducing emissions we do not have the knowledge or expertise to comment on the targets set, the supporting framework or the reporting and scrutiny framework.
- 1.3 We are concerned however with the supporting measures: what can be done to reduce our emissions and thus hit the targets set out by the Government. We feel that there is scope to have these issues included in the proposed Bill.

2 BUILT ENVIRONMENT

- 2.1 More than 40% of Scotland's CO₂ emissions come from the energy that we use to heat, light and run our buildings (*A Low Carbon Building Standards Strategy for Scotland, 2007*). Therefore, a worth while contribution in the drive to reduce emissions by 80% can be made by ensuring that new buildings are built in a way that minimises emissions and that existing buildings are improved and refurbished.
- 2.2 There are a number of measures that could be set out in the proposed Climate Change Bill which will encourage more sustainable development practices:
 - a) Sustainability given more weight within the planning system

More weight should be given to sustainability when it comes to determining planning applications and identifying sites within development plans. The more sustainable a development, the greater chance it should have of gaining consent or an allocation. This will allow for the promotion of more sustainable development practices.

To enable the local authority to judge the sustainability credentials of proposed developments, each proposal whether it be a planning

application or a representation to a local plan should be accompanied by a sustainability statement.

Sustainability being given more weight within the planning system could be implemented through a review of SPP1.

b) Exemplars developed.

The proposed climate change bill should require exemplars to be developed in order to demonstrate what is achievable. Exemplars should be established in:

- Eco-housing
- Waste infrastructure
- Renewable energy
- Sustainable urban drainage
- Community development
- Transport infrastructure

Each local authority should be required to establish an “eco” exemplar within their local authority to ensure that the effects are spread throughout Scotland, not just within forward thinking local authorities.

The development for the 2014 Commonwealth Games provides a prime opportunity to create an exemplar of good standards in terms of sustainable design.

c) Updating of building regulations

Building regulations need to be updated in line with the Government's vision to reduce emissions. Improving the energy efficiency of buildings can play a large part in achieving the emissions targets at relatively low expense. The only way to ensure that energy efficiency of properties improves is to make it a requirement within the building regulations. A set of minimum standards should be established with regards to the energy efficiency of properties.

We understand that the building trade will be resistant to change but changes to the building regulations need to be forced through if the development industry is really to make a contribution to Scotland's efforts to cut emissions.

2.3 As stated in the consultation paper, new buildings only represent 1% of the building stock each year. Therefore, in order to have a real impact the existing built fabric will require to be upgraded. Banks Developments believe that there are measures that should be introduced to encourage this:

a) VAT exemptions for eco-improvements

In order to encourage people to improve the energy efficiency of their property no VAT should be charged on works undertaken to this end.

b) Sustainability levy

For all new houses built a locally generated sustainability levy should be charged. The contributions would be put into a "pot" with the money being distributed throughout the local area (it could be done within local authority areas). The money generated would go towards funding the improvement of the energy efficiency of the existing building stock in the local area.

This levy should be based on a sliding scale depending on the eco-rating of the new build – less energy efficient properties would pay a higher contribution than more energy efficient buildings, with zero carbon developments being exempt. Another exemption should be affordable housing

3 ENERGY/WASTE

3.1 Scotland should invest in technologies and business.

Scotland has massive potential when it comes to renewable energy resources and more use should be made of them. But not only should investment be made in the resources, we should be investing in the technologies and businesses that are associated with renewable energy. Scotland should develop a skills base in this area which puts us at the forefront.

3.2 Localised Generation

Localised generation of energy should be encouraged and supported wherever possible.

3.3 Localised Waste Energy Parks

Banks Developments welcome the new waste guidelines but believe that more positive encouragement for local schemes should be given in planning policy. Facilities that transfer waste to energy should be related to development schemes to provide for a more holistic approach and to make them commercially viable.

4 ECO TOWNS/SCOTTISH SUSTAINABLE COMMUNITIES

4.1 The eco-towns concept combines many of the elements discussed above. Therefore, Banks Developments believe that the proposed bill should acknowledge the importance that eco-towns/ the Scottish Sustainable Communities initiative can have in reducing the effects of climate change.

4.2 A comprehensive, joined up approach is required to tackle climate change and reduce our emissions. Eco-towns provide for this as they include not only housing/buildings, but take transport, energy and waste into consideration

when planning developments. They provide a holistic approach to tackling many of the issues associated with climate change.

4.3 By having such a comprehensively planned package, eco-towns allow for a new physical infrastructure to be designed that allows people to reduce the impact that they have on the environment.

4.4 Banks Developments are proposing such a development in Cardenden, Fife. It is hoped that it can become an exemplar of what can be achieved

5 CORPORATE MEASURES

5.1 There are other measures that we feel should be introduced through the bill which would have an impact on reducing our emissions and thus hitting the targets set out.

a) Tax Breaks

In order to incentivise companies to become more sustainable, tax breaks should be offered to low carbon companies.

b) Employers to take to the lead

To have a really impact on our emissions people are going to have to adapt. In order to assist, advise and encourage people to change and source the funding available for doing so, companies should be required to employ/identify a member of staff who is responsible for offering advice and guidance.

6 CARBON CALCULATOR

6.1 A common carbon calculator needs to be introduced so that a standard can be developed and progress can be measured. It needs to be tangible so that people can relate to it.

7 UNNECESSARY BODIES

7.1 Under Section 7 of the consultation (reporting and scrutiny framework) a few of the questions referred to setting up of new bodies to offer advice, monitor progress and scrutinising the effectiveness of policy. Creating unnecessary quangos that simply restrict growth should be avoided.

7.2 An annual report prepared by the Government could be scrutinised by the Transport, Infrastructure and Climate Change Committee of the Parliament, which already exists.

8 CONCLUSIONS

8.1 As a company Banks Developments recognise the threat of climate change and accept that something has to be done now before it is too late. We therefore welcome the Scottish Government's aim to reduce emissions by 80% by 2050 and feel that the creation of a climate change bill is a crucial step if this target is to be reached.

- 8.2 The bill would be most effective if it sets out not only the targets and how these targets will be monitored, but also if it incorporates measures that should be put in place to achieve the targets.
- 8.3 The Climate Change Bill should establish the principle of Eco-towns (Scottish Sustainable Communities), exemplars, and the alteration of building regulations and planning policy. Measures should be put in place that would encourage improvement of the existing housing stock. The role that energy and waste can play should be considered, as well as incentives and guidance that can be offered to make individuals and companies more environmentally friendly.