

Citizen Participation and Public Petitions Committee
Wednesday 24 September 2025
14th Meeting, 2025 (Session 6)

PE2113: Provide support to RAAC-affected communities

Introduction

Petitioner Wilson and Hannah Chowdhry

Petition summary Calling on the Scottish Parliament to urge the Scottish Government to provide support to communities affected by Reinforced Autoclaved Aerated Concrete (RAAC) by:

- setting up a national fund to assist struggling homeowners and tenants affected by RAAC
- initiating a public inquiry to investigate the practices of councils and housing associations concerning RAAC, including investigation of how business related to RAAC was conducted, the handling of safety reports and property sales, disclosure of RAAC, and responses to homeowner concerns
- introducing or updating legislation, similar to the General Product Safety Regulations, to ensure developers, councils, and housing associations are held accountable for using substandard property materials, mandate risk disclosure, and make surveyors and solicitors liable for untraced defects. Legislation should also include provision for a comprehensive register of high-risk buildings in Scotland.

Webpage <https://petitions.parliament.scot/petitions/PE2113>

1. [The Committee last considered this petition at its meeting on 13 November 2024.](#) At that meeting, the Committee agreed to write to the Built Environment Forum Scotland, the Royal Institution of Chartered Surveyors, the Chartered Institute of Building, the Royal Incorporation of Architects in Scotland, and the former Minister for Housing.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new written submissions from the Royal Institution of Chartered Surveyors, the former Minister for Housing, the Royal Incorporation of Architects in Scotland, the Chartered Institute of Building, the Built Environment Forum Scotland and the petitioner, which are set out in **Annexe C**.
4. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage.](#)

5. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
6. [The Scottish Government gave its initial response to the petition on 22 August 2024.](#)
7. Every petition collects signatures while it remains under consideration. At the time of writing, 2,514 signatures have been received on this petition.

Action

8. The Committee is invited to consider what action it wishes to take.

Clerks to the Committee
September 2025

Annexe A: Summary of petition

PE2113: Provide support to RAAC-affected communities

Petitioner

Wilson and Hannah Chowdhry

Date Lodged

23 July 2024

Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to provide support to communities affected by Reinforced Autoclaved Aerated Concrete (RAAC) by:

- setting up a national fund to assist struggling homeowners and tenants affected by RAAC
- initiating a public inquiry to investigate the practices of councils and housing associations concerning RAAC, including investigation of how business related to RAAC was conducted, the handling of safety reports and property sales, disclosure of RAAC, and responses to homeowner concerns
- introducing or updating legislation, similar to the General Product Safety Regulations, to ensure developers, councils, and housing associations are held accountable for using substandard property materials, mandate risk disclosure, and make surveyors and solicitors liable for untraced defects. Legislation should also include provision for a comprehensive register of high-risk buildings in Scotland.

Background information

[The Scottish Housing Regulator has published information on the presence of RAAC in social housing](#). 1,994 properties across Scotland are affected with thirteen social landlords reporting RAAC in homes they provide to tenants.

Councils and Housing Associations (HA) across Scotland are denying assistance to homeowners and private tenants. Council tenants now face displacement without any form of compensation for renovating their homes. Residents are being torn from the communities they cherish and depend on. They are being left in financial crisis, and in some cases face roof collapse.

We are seeking identification by RICS qualified surveyors where there may be possible RAAC threat, a requirement for solicitors to check for council disclosures of RAAC, and increased liability for surveyor and solicitor failures to identify defects.

A measure similar to the General Product Safety Regulations, which mandates manufacturers to address safety defects for the lifetime of a vehicle, should be introduced to ensure developers are accountable for rectifying safety issues even after purchase.

Annexe B: Extract from Official Report of last consideration of PE2113 on 13 November 2024

The Convener: The first new petition is PE2113, lodged by Wilson and Hannah Chowdhry, which calls on the Scottish Parliament to urge the Scottish Government to provide support to communities that are affected by reinforced autoclaved aerated concrete.

The petition calls for a national fund to be set up to assist struggling homeowners and tenants who are affected by RAAC; and for the initiation of a public inquiry to investigate the practices of councils and housing associations on the issue, including investigation of how business related to RAAC was conducted, the handling of safety reports and property sales, the disclosure of RAAC, and responses to homeowners' concerns. It also calls for legislation that is similar to the General Product Safety Regulations 2005 to be introduced or updated to ensure that developers, councils and housing associations are held accountable for using substandard property materials. Such legislation should mandate risk disclosure and make surveyors and solicitors liable for untraced defects, and it should include provision for a comprehensive register of high-risk buildings in Scotland.

The Scottish Parliament information centre briefing notes that, although the Scottish Government is not currently providing financial support to homeowners or local authorities for RAAC remediation work, it previously operated a scheme to support those who had bought a home designated as having inherent structural defects.

In its response to the petition, the Scottish Government set out that

“the presence of RAAC in a building does not necessarily mean that the building is unsafe”,

and recommends that homeowners follow the risk-based approach of the Institution of Structural Engineers, as there may be no issues to address at some properties. The response goes on to state that Scottish Government is committed to working with the UK Government on the issue, and also references the requirement for local authorities to have in place a scheme of assistance strategy, which should set out the support available to private homeowners to make repairs to their home.

The response also mentions plans to review the Scottish home report, which is expected to consider how to ensure buyers can make an informed decision in relation to undertaking more detailed surveys, including structural reports establishing how the property is built, what materials are used and how these will perform in the future.

The petitioners have also provided two written submissions, the first of which comments on the Scottish Government's response and raises concerns about the action, or lack thereof, that has been taken by local authorities to address this issue. In particular, the petitioners highlight that, although Scottish councils offer advice and guidance through the scheme of assistance strategy, none of them offers financial support to homeowners aiming to retain and remediate their properties.

The petitioners' second submission follows the recent UK budget and the announcement of an additional £3.4 billion for Scotland, and calls for a portion of that

funding to be allocated to support the needs of homeowners who are affected by RAAC. We have also received submissions from our MSP colleagues Edward Mountain and Murdo Fraser in support of the petition's aims.

We have received comprehensive information in advance of our consideration of the petition. Do colleagues have any suggestions as to how we might proceed with what is an important petition? Many of us will have seen documentary coverage of the issues arising from buildings that are affected by RAAC.

David Torrance: I wonder whether the committee would consider keeping the petition open and writing to the Built Environment Forum Scotland, the Royal Institution of Chartered Surveyors, the Chartered Institute of Building and the Royal Incorporation of Architects in Scotland to seek their views on the action called for in the petition. The committee could also consider writing to the Minister for Housing to highlight the petitioners' submissions, including the concern that local authorities' scheme of assistance strategies offer homeowners only advice and guidance, rather than making provisions for financial support where repairs are required.

The Convener: It would also be reasonable to seek an update on discussions with the UK Government on funding for RAAC remediation and management, including whether the Scottish Government has any scope in that. The committee may also wish to ask the minister for further information on its plans to review the Scottish home report.

I feel that the issues that have been raised in the petition merit the committee taking formal evidence, and the information that we are seeking will help to inform the committee. The issue is of significant material concern to the individuals who have been affected by RAAC.

Whether we think that the answers that we receive allow the petition's aims to be advanced in a meaningful way or whether we think that they will have to be addressed by some other means, we should flag up that this is very much an issue on which we might wish to take evidence from the minister at a future meeting. Are members content with that approach?

Members *indicated agreement.*

The Convener: We will keep the petition open and take forward the evidence gathering as suggested this morning. We will also write to the Minister for Housing to seek responses to the points that have been made by the petitioner, and we will seek information from the UK Government. We will do all that with a view to potentially hearing from the minister in order to explore the issues in, I hope, more detail and to get some answers for the many people who have been affected by this issue.

I see that the petitioners are in the gallery. Unfortunately, it is not competent for us to take contributions from the gallery, but I am delighted to recognise that they have taken the trouble to come along and hear our consideration of the petition this morning. I hope that they are pleased that the petition is staying open and that we will be taking forward the issues that it seeks to explore.

Annexe C: Written submissions

Royal Institution of Chartered Surveyors (RICS) written submission, 13 December 2024

PE2113/F: Provide support to RAAC-affected communities

The Royal Institution of Chartered Surveyors is pleased to respond to the Citizen Participation and Public Petitions Committee in respect of the petition [PE2113: Provide support to RAAC-affected communities](#). We hope the response below is useful to the committee, providing responses to the core questions and suggestions raised below.

Calling on the Scottish Parliament to urge the Scottish Government to provide support to communities affected by Reinforced Autoclaved Aerated Concrete (RAAC) by:

- **setting up a national fund to assist struggling homeowners and tenants affected by RAAC –**

A national fund to support the remediation of potentially defective building materials, such as cladding or RAAC could prove useful. For example, while the Building Safety Levy is focused on supporting cladding remediation efforts, there is potential that it could be extended to cover RAAC, and other building safety works in the future.

Nevertheless, we have several questions regarding what this fund would look like and whether it would be necessary. For example:

- What would be the purpose of the public funding? To fund surveys/assessments and/or monitoring and/or remediation? Could a type of insurance support be considered?
- What is the scale of the problem and size of fund needed? RAAC is not prevalent from the surveys undertaken so far – a limited number of estates, and remediation costs are variable. However, it's possibly too early to be definitive.

Overall, accurate data is needed on how many dwellings contain RAAC and how many are likely to be in private ownership, as stated earlier, the numbers could be low and not all will need any form of remedial work, as the condition of the RAAC could still be satisfactory.

- **initiating a public inquiry to investigate the practices of councils and housing associations concerning RAAC, including investigation of how business related to RAAC was conducted, the handling of safety reports and property sales, disclosure of RAAC, and responses to homeowner concerns**

The public concern about this matter is understandable given the potential safety issues involved. RAAC has proven to be not as durable as other concrete building materials when regular inspection and maintenance has not been carried out.

Nevertheless, it has a variable service life which is influenced by many factors and an arbitrary time, such as the widely reported '30 years' life span, should not be the deciding factor when decision making as it can last longer if the building is well maintained and the original design factors have not changed (such as calculated load weights). We potentially run the risk of detrimentally affecting all flat roof properties if we do not take a proportionate response to this issue.

RICS provides information on RAAC - [RAAC: Advice and FAQs](#) as does IStructE - [Reinforced Autoclaved Aerated Concrete \(RAAC\) Investigation and Assessment – Further Guidance - The Institution of Structural Engineers](#). RICS is also in the process of developing a RAAC-focused consumer guide, which is expected to be ready in Q2/Q3 2025. Finally, [the RAAC Playbook | MTC](#) has recently been launched, which provides a comprehensive resource designed to help construction professionals, estate managers, and stakeholders confidently assess the presence and condition of RAAC in buildings.

A public inquiry seems unnecessary, both being time and resource intensive. Not all properties identified with RAAC are "At Risk" properties, as many may not have structural issues and if well maintained may remain in a reasonable condition. Instead, focus is best spent on identifying and remediating properties affected by RAAC in a poor condition.

- **introducing or updating legislation, similar to the General Product Safety Regulations, to ensure developers, councils, and housing associations are held accountable for using substandard property materials, mandate risk disclosure, and make surveyors and solicitors liable for untraced defects. Legislation should also include provision for a comprehensive register of high-risk buildings in Scotland.**

In regard to RAAC, this does not seem like a proportionate approach to take. As stated previously, RAAC was a legitimate material to use in the past, with Developers and Councils approximately 30-50 years ago most commonly using it as precast roof panels in flat roof construction. Malpractice would only occur if RAAC was a known issue and reports were suppressed. In many cases RAAC is still in a serviceable condition as it has been maintained properly, without additional load bearing structures/features added to it. Instead, it's how RAAC might deteriorate with poor maintenance that is the issue, and as outlined above, many groups have provided advice and guidance on how to identify and remediate RAAC.

In addition, to apply liability to surveyors and solicitors for untraced defects on materials that were previously compliant with building regulations would severely affect the property market, as no one would take on that liability nor could they gain Professional Indemnity Insurance for it. It also highlights a misunderstanding around the role and responsibilities of a surveyor. For example, residential surveyors completing a Home Report, are already tasked with recording suspected RAAC – this is usually done through noting suspect flat roofed concrete structures, which may show signs of deterioration, i.e. water ponding on the roof. If a surveyor is not sure of the material used in the construction (as most surveys are non-invasive and apparent defects can often be concealed behind the fabric of a property), then they would highlight that further investigation is required by a qualified structural engineer or equivalent specialist building surveyor to deem whether remediation is necessary.

In addition, there are already avenues that can be explored if RAAC (or other building defects) have not been properly identified by a Regulated Member (these are RICS professionals or RICS-regulated Firms that we regulate). We provide information on raising complaints here: [Investigating your concerns about a RICS Member or RICS-Regulated Firm](#). Further information around [our regulation standards and practices can be found here: Regulation](#).

Finally, in terms of a 'comprehensive register of high-risk buildings in Scotland'; steps are already being undertaken by Scottish Government to develop a register for all buildings with defective cladding that have had a Single Building Assessment and have undergone remediation. This was referenced as part of the [Housing \(Cladding Remediation\) \(Scotland\) Act 2024](#).

Minister for Housing written submission, 16 December 2024

PE2113/G: Provide support to RAAC-affected communities

I refer to your correspondence of 20 November 2024 as Convenor of the Citizen Participation and Public Petitions Committee inviting further information on a number of issues in respect of Petition 2113 urging the Scottish Government to provide support to communities affected by Reinforced Autoclaved Aerated Concrete (RAAC).

I note the Committee has specifically requested comment in respect of three issues:

- 1) concern that local authority Scheme of Assistance Strategies only offer homeowners advice and guidance, rather than making provisions for financial support where repairs are required
- 2) an update on discussions with the UK Government on funding for RAAC remediation and management, including whether the Scottish Government will use funding resulting from the recent UK Budget to address this issue, and
- 3) further information on the planned review of the Home Report and the anticipated timetable for this.

To take each of these points in turn.

Local Authority Scheme of Assistance

The Scottish Government's policy towards local authorities' spending is to allow local authorities the financial freedom to operate independently. As such, the vast majority of funding is provided by means of a block grant. It is then the responsibility of individual local authorities to manage their own budgets and to allocate the total financial resources available to them, on the basis of local needs and priorities, having first fulfilled their statutory obligations and the jointly agreed set of national and local priorities.

The 2024-25 settlement distributed £28.668 million of capital, and £26.934 million in revenue with an additional £4.493 million for administration. Local authorities are able to use revenue funding for capital purposes but cannot use capital funding for revenue purposes.

Engagement with the UK Government on funding

In respect of engagement with the UK Government, the Scottish Government has consistently called on the UK Government for support in addressing the issue of RAAC, including through making available new capital funds to allow any action that may be required.

The previous Chancellor promised to 'spend what it takes' to deal with RAAC. More recently, ahead of the current UK Government's budget, I wrote to the Chancellor urging her to set up a dedicated fund which would support the costs of investigation, remediation and any potential rebuilding – with such a fund having consequential impacts on Scottish Government funding. No specific fund was announced.

In the submission to the Committee dated 1 November, the petitioner notes the budget allocation of £3.4bn by the UK Treasury to the Scottish Government and proposes that a portion of this be directed towards addressing the critical needs of homeowners affected by RAAC.

While welcoming the increase in funding, it is important to note the continued and unprecedented challenges to public finances. The Scottish Government has made it clear that the extent of the challenges will not be addressed in a single year. Moreover, once the Scottish Budget process is complete, it will be a matter for individual public authorities, including Health Boards and Local Authorities, to agree their own spending priorities in using their budget allocations, including any amounts to be directed towards building and estate management.

RAAC is a building maintenance issue and, as such, its management is the responsibility of the building owner (as with any other such matter), whether a school, hospital, social housing, or private home.

It is also worth noting that RAAC is not regarded as a defective material. However, as with any building material, it should be appropriately maintained with regular monitoring for issues such as water ingress – with liability for this resting with the building owner, including any responsible public authority. Considerable guidance and advice on RAAC is available from organisations such as the Institution of Structural Engineers.

Notwithstanding the above and the lack of support to date from the UK Government specific to RAAC funding for homes, I will continue to engage with UK Government Ministers on this issue.

Review of the Home Report

The Review of the Home Report commenced in November 2024. A working group of key industry experts has been tasked with assessing the current Home Report and prescribed documents, to understand what is working well and which aspects of the Home Report need to be amended. This will include consideration of the role of the Home Report in ensuring prospective buyers have sufficient evidence about the condition of the home they are planning to buy. We anticipate the group will make recommendations to Scottish Ministers for any changes required by autumn 2025. Legislation will be required to take forward any changes to the Home Report prescribed documents and would require to be consulted on.

I hope the Committee finds this further information helpful.

Yours sincerely

PAUL MCLENNAN

Petitioner written submission, 28 January 2025

PE2113/H: Provide support to RAAC-affected communities

1. Response to [Minister for Housing submission dated 16 December 2024](#).

While we appreciate the detailed response, I must express my disappointment with the Scottish Government's position and its lack of tangible support for RAAC-affected homeowners.

1.1. Local Authority Scheme of Assistance

Councils have repeatedly explained the Scheme of Assistance, which provides little beyond advice. Despite the Scottish Government's claim of financial freedom, Aberdeen, Clackmannanshire, and West Lothian councils state they lack the funds to support RAAC-affected homeowners. They appreciate the UK RAAC Campaign Group (UKRCG) raising the issue but are also seeking additional funding from the Scottish Government. Every council we are communicating with emphasises that decisions must be financially viable, and delays in resolving the crisis are due to a lack of Government support. We have nearly brokered a deal with Clackmannanshire Council for roof repairs, with the council agreeing to continue pressing the Government to cover sundry debts, acknowledging that homeowners will struggle with payments. Meanwhile, Aberdeen Council has reached a stalemate, as a Compulsory Purchase Order will not succeed, and residents are not engaging in the voluntary acquisition process. How long will the Government allow this to continue?

We appreciate the continued efforts to seek support from the UK Government, which we are also pursuing. However, if assistance is refused, a stronger push to reallocate Scottish Government funds is needed. Many homeowners face severe financial and emotional distress, including depression, bankruptcy, and suicidal intent.

1.2. UK Government Responsibility

Shifting responsibility solely to the UK Government is a cop-out. In Basildon, homeowners received fair pre-RAAC valuations, and council tenants got £8,680 grants. In Scotland, councils deduct £50,000–£70,000 from valuations, while tenants received just £1,500—barely enough for carpeting.

This is primarily a Scottish issue, caused by Scottish councils that continued using RAAC while others stopped. Reports of construction problems were ignored, and worker concerns, like in Dundee, were dismissed after brief delays. The Scottish Government cannot deflect responsibility for the consequences of these decisions.

1.3. Mischaracterization of RAAC as a building maintenance issue

RAAC is more than a maintenance issue. Many deteriorating roofs were managed by councils as factors and majority shareholders, yet they failed to maintain them, causing losses for homeowners. By offloading liability for latent defects through the Right to Buy scheme, the government has left homeowners to bear the burden of systemic failures and lack of disclosure.

1.4. Lack of Notification to Homeowners

Homeowners were never informed about RAAC, nor was this disclosed to subsequent buyers. My daughter bought her home in June 2023. Her Home Report recommended a roof inspection, which she commissioned. The inspector found it in good condition but didn't test for RAAC, as it wasn't mentioned. This is common—how can homeowners be blamed for such an oversight?

In Aberdeen, even when RAAC is stable, the council is opting for demolition due to issues like undersized 45mm supporting beams, which fail to meet the current 70mm standard. This stems from cost-cutting during construction, not homeowner negligence

1.5. Questions on RAAC Testing and Risk Assessment

In recent meetings with the Scottish Government's Better Homes Division and Building Standards, we questioned whether RAAC underwent cold temperature or water testing in the 1960s before its widespread use in roofs. We have also submitted an FOI request to determine if risk assessments were conducted for homes near coal mines and quarries, like those in Tillicoultry. Residents recall buildings shaking during quarry blasting in the 1980s, likely damaging RAAC roofs. Was this ever investigated?

1.6. Home Report Review and Further Engagement

We appreciate the Minister's update on the Home Report review. **The UKRCG has ideas to contribute and requests a further face-to-face meeting with the working group, ideally with BRE, IStructE, and RICS also present.**

Officials who met us on 14 January acknowledged gaining valuable insights into the RAAC crisis. We hope to further enhance understanding of its impact on homeowners and propose solutions to strengthen and refine any legislative or procedural amendments.

2. Response to [RICS submission dated 13 December 2024](#)

2.1. National Fund

We welcome RICS's initial support for a national fund to address RAAC issues. However, we believe and made it clear previously the fund's scope should go beyond inspections and monitoring to include remedial works and compensation for valuation shortfalls, especially where councils opt for demolition.

RICS seems to underestimate the scale of the issue. Based on available data, we estimate up to 1,200 private homes could be affected, with average remediation costs of £30,000 per home, totalling around £36 million. While some homeowners in

Aberdeen report lower remediation costs than council quotes, councils must be held accountable for obtaining at least three competitive quotes to ensure cost efficiency.

We suggested the Building Safety Levy as a potential funding source, and the RICS position aligns with ours. Additionally, we propose reallocating parts of the affordable homes budget or creating a dedicated fund to address this crisis.

2.2. Public Inquiry

We strongly disagree with RICS's assertion that a public inquiry is unnecessary. The statement that "not all properties identified with RAAC are 'At Risk'" overlooks the unique challenges faced by Scottish homeowners and reflects a limited understanding of the RAAC housing crisis, where over 80% of affected homes are set for demolition or require full roof replacements.

A public inquiry is essential to uncover the root causes of this crisis, identify responsible parties, and ensure transparency. The public deserves answers on how this safety issue arose and how similar situations can be prevented in the future.

2.3. Legislation

We strongly disagree with the statement that updating legislation (as outlined in the third ask of our petition) "does not seem like a proportionate response" and find the RICS submission dismissive and unaware of key historical and practical realities. The Scottish Government is already reviewing legislation around home reports, while [England and Wales have introduced amendments to the Building Safety Act 2022](#).

3. Conclusion

Given these issues, it is clear to us that the Scottish Government bears significant responsibility. Homeowners purchased properties in good faith, unaware of latent defects caused by poor material choices and inadequate maintenance. The Scottish Government must acknowledge its role and take decisive action to support affected homeowners.

Does the Scottish Government/RICS still contend that this is solely a homeowner issue, despite the systemic failures outlined above?

The RAAC housing crisis is a complex issue that requires a comprehensive and informed response. We urge RICS to consider:

- Advocating for a national fund that addresses all aspects of the RAAC crisis
- Supporting a public inquiry to investigate the historical and systemic failures, based on information provided above
- Re-evaluating its stance on legislation to ensure greater accountability and transparency in the construction of RAAC homes.

We look forward to working collaboratively with RICS and others to address these critical issues and support affected homeowners.

The Royal Incorporation of Architects in Scotland (RIAS) written submission, 24 February 2025

PE2113/I: Provide support to RAAC-affected communities

Commentary on setting up a national fund to aid struggling homeowners and tenants affected by RAAC.

The Royal Incorporation of Architects in Scotland (RIAS) considers it iniquitous that householders, through no fault of their own, find themselves facing very substantial remediation costs for latent defects of this nature.

Scotland has been here before with around 14,000 post-war houses designated as defective under the 1987 Housing Act. A comprehensive and well-funded remediation scheme was delivered by the Scottish Office / Scottish Executive, Scottish Homes, and local authorities spanning more than a decade. Technically, this programme was only repealed in 2018. The scale of the RAAC, cladding, and other related structural and damp ingress problems suggests the need for similar level of sustained intervention. A market-led approach to repairs, which is reliant on individual housebuilders, property owners and social landlords will not succeed without government direction and funding. In our view the petitioners are therefore right to seek details of a workable means of tackling the problem.

The RIAS notes the slow, limited progress on recouping costs of remediating buildings affected by the parallel cladding crisis. When developing a response to RAAC, the funding mechanism developed by the UK Government for cladding is an unfair model for funding a national remediation programme – with unintended consequences.

Without Barnett funding, any equivalent programme for RAAC will further deplete funding needed for the housing emergency. The Scottish Government should continue discussions with the UK Government on a proportionate and fair funding mechanism for latent defects in housing, including cladding and RAAC. Even for the minority of householders with access to repair funds, a public led, and centrally organised programme will be fairer, more efficient, and cheaper overall. It also acknowledges and takes responsibility for the historic causes of the problem.

Views on starting a public inquiry to investigate the practices of councils and housing associations concerning RAAC, including investigation of how business related to RAAC was conducted, the handling of safety reports and property sales, disclosure of RAAC, and responses to homeowner concerns.

There is a need to ensure that the cycle of latent defects seen with large panel systems, PRC homes, RAAC, and combustible cladding does not continue. Quality of design and construction should be central to the Government's procurement agenda, and we support current work looking at this.

Nonetheless we view the suggestion of another public inquiry around RAAC as problematic on two counts.

Firstly, it will divert time and effort from organising the immediate response, which is already hampered by a severe lack of resources both in central government and at a

local authority level. We also note the results of the inquiry will take several years (as per defects in hospitals) when householders need action at the earliest possible opportunity. The multi-million-pound costs of inquiry would be better spent delivering immediate support to householders.

Secondly, the decisions which led to the use of RAAC were made over 40 years ago. It is these which have led to the crisis we see today. In most cases the public authorities no longer exist, e.g., District Councils, the Scottish Special Housing Association or New Town Development Corporations. The senior staff involved will be long retired or deceased, and correct records and accounts will be exceedingly difficult to assemble. Our concern is that a long and expensive inquiry would simply confirm that short-sighted procurement decisions prioritised lowest cost materials over better technical choices – aligned with poor oversight.

We do, however, think the Scottish Parliament should ensure that there is a thorough review of procurement practices in construction. Despite ongoing consultation on construction quality, our experience is a cost-driven system focused on short term goals. The role of construction professionals, including architects, is still being undermined by preferences for sub-optimal alternative build strategies of unproven durability.

Views on introducing or updating legislation, like the General Product Safety Regulations, to ensure developers, councils, and housing associations are held accountable for using substandard property materials, mandate risk disclosure, and make surveyors and solicitors liable for untraced defects. Legislation should also include provision for a comprehensive register of high-risk buildings in Scotland.

Adequate measures to protect the public are essential but need to be balanced against potential impediments to delivering new housing in a time of significant unmet need. The extended periods of liability introduced retrospectively for defective premises within the Building Safety Act, aimed primarily in England, have led to concerns around insurances and market risk. We also believe there will be challenges in regulating products at a Scottish level within the UK single market within the scope of devolved powers.

The ongoing work at both Scottish and UK level to implement the recommendations from the Grenfell Stage 2 Inquiry should deliver significant improvements in compliance with the building regulations. The RIAS draws particular attention to the incoming Compliance Plan Manager (CPM) regime however this must be more than a light touch tick-box exercise. It must also be delivered in tandem with procurement reform.

There is little evidence to suggest deliberate deception is the biggest cause of poor standards in construction. However, if problems are not looked for or detected before buildings are completed, no one is accountable then issues emerge years later. At present, most inspections are desk-based and visual and cannot detect problems within the building's structure or design details. The Scottish Government would need to consult on more expensive and invasive inspections when buildings are first completed or later sold. Changing to a more robust regime, especially post-occupancy inspections as part of the building warrant process, is something the RIAS strongly supports. This is a matter of cost and to an extent having sufficient

skills and ability within the regulatory system. Building control is still an under-funded and under-resourced service, which requires sustained investment at a local authority level.

Creating a high-risk building register will be challenging in terms of definition (e.g., level of risk) and require considerable time and resources to compile. It could also have unintended consequences, including curtailing the ability to obtain insurance, remortgage, or sell properties, and legal challenges from householders would be likely. The proposal from BEFS and other bodies for a general register or “building passport” which provides records of building construction and repair offers a more practical alternative and better information of property purchasers.

Summary and Conclusions

The Scottish Government faces a major challenge responding to RAAC alongside other latent defects related to novel materials and building techniques (for example, combustible cladding). This is an issue of public safety and housing supply (which requires a coordinated and comprehensive response. The overall costs are beyond the scope of both existing national and local revenue (repair) and capital funding (replacement) budgets for housing. These budgets are already fully deployed resourcing new social housing and retrofit programmes. However, funding must be found given the hardship householders face because of poor public procurement and regulation practices.

By overhauling public procurement and implementing the Grenfell recommendations, Scotland can at least prevent further crises of this scale. The RIAS would welcome a reformed system that emphasises design and construction quality standards - not just the bottom line.

The Chartered Institute of Building (CIOB) written submission, 5 March 2025

PE2113/J: Provide support to RAAC-affected communities

Introduction

The Chartered Institute of Building (CIOB) is the world's largest and most influential professional body for construction management and leadership. Our status as a chartered professional body means we act in the public interest and develop policy positions, recommendations, and research based on evidence and best practice. Our members, over 2,600 of which are based in Scotland, work worldwide in the development, conservation, and improvement of the built environment.

We recognise the concerns raised within the petition and agree that urgent government action and leadership on RAAC is needed. However, we have focused this briefing on some of the broader issues relating to RAAC and have outlined the CIOB's recommendations for the shape and scope of the Government actions we feel would help to address these issues and provide the necessary supports to those affected by RAAC.

This briefing makes the following recommendations:

- Take urgent action to provide guidance and advice to homeowners as well as the industry on the approach to assessing and, where needed, remediating properties with RAAC.
- Develop a national programme for approaching RAAC. This programme should include guidance to advise on the course of action for assessing and remediating RAAC as well as the process for ongoing monitoring and managing of properties where RAAC is diagnosed but left in situ. This programme should consider the funding streams needed to support property owners of all types to undertake these assessments and any remediation works required.

Reinforced autoclaved aerated concrete (RAAC)

The CIOB formed part of the membership of the Construction Leadership Council's (CLC) RAAC Industry Response Group, which aimed to act as a conduit and coordinator for wider RAAC issues. The group has previously published an FAQ document on RAAC.¹

In Scotland, CIOB members are directly involved in the response to RAAC-affected properties. Our members have highlighted a recent influx of tenders, in particular from local authorities, seeking bids for RAAC remediation projects. In many cases, structural engineers have been engaged to undertake a structural analysis of these buildings. In responding to these tenders, our members have cited several challenges and areas in which urgent, definitive government action will be needed in order to appropriately address these challenges.

Members shared the significant frustration they have seen among tenants and homeowners due to delays in undertaking remediation works. In some cases, households have been displaced for over a year with no information, updates, or direction on the appropriate or intended course of action for remediation. For homeowners, the lack of both guidance and funding mechanisms poses significant challenges to their ability to undertake works to allow them to return to their homes.

Though RAAC is not the same challenge as cladding, there are many parallels in the experience of tenants and homeowners, who have shared difficulties in selling or mortgaging their homes. Further, mirroring issues arising during cladding remediation discussions, members indicated the difficulties arising in securing the necessary access to properties to fully assess the presence and possible risks of RAAC. They further noted that in some cases of mixed tenure properties, owner-occupied homes are being excluded from local authority-led tenders.

Additionally, other stakeholders, such as local authority property owners, are operating without the necessary funding and guidance to expedite action where needed to assess, remediate and, where appropriate, continue to inspect and assess RAAC left in situ. In the absence of comprehensive national guidance, our members' clients, often local authorities, are taking differing approaches to dealing with RAAC in their stock, often dictated by their own funding limitations.

¹ Construction Leadership Council, "[Information and FAQs on reinforced autoclaved aerated concrete \(RAAC\)](#)", November 2023.

Our members made clear urgent, definitive action from Scottish Government is needed. Property owners need to be provided with funding, assistance, guidance and assurance. It is recognised that properties and projects will vary: there will be no single solution to remediating buildings where RAAC is installed. Therefore, it is imperative all properties be assessed and, if appropriate, monitored by qualified, competent professionals.² However, our members raised concerns about the absence of any consistent approach when agreeing on a course of action where RAAC has been identified.

Therefore, to support these assessments and the wider response to properties where RAAC is present, a national programme should be developed. This programme should include guidance to advise on the course of action for assessing and remediating RAAC as well as the process for ongoing monitoring and managing of properties where RAAC is diagnosed but left in situ.³ Further, this programme should consider the funding streams needed to support property owners of all types to undertake these assessments and any remediation works required.

Addressing the foundational challenges of upholding building quality and safety in Scotland

The complexity of Scotland's tenure system underpins all quality and safety discussions around the built environment. Energy efficiency, RAAC, and general repairs and maintenance are each disadvantaged by the absence of necessary legal and financial structures. These structures are needed to assess, agree, and complete building works, and their absence is a barrier to achieving quality and safety in the built environment. As such, the proposals for the establishment of Compulsory Owners Associations (COAs) and related legislation contained in the [Scottish Law Commission's discussion paper](#)⁴ represent a welcome first step to establishing the necessary governance structures to address the maintenance of homes across Scotland. However, as the CIOB has argued, further work will be required to ensure that funding mechanisms for maintenance works are fit for purpose.

Conclusions

In speaking with our members about issues such as RAAC and cladding, one consistent theme has arisen: there are ongoing issues and emerging challenges with the safety and quality of our built environment.

Put frankly, it is likely issues with building safety will continue to arise as climate change increases drastic weather events and our existing building stock continues to age. Therefore, we urge the Scottish Parliament to think forward, to consider not only the current issues at hand but how to implement policies and frameworks that will allow Scotland to be a world leader in responding to safety concerns as they arise. Taking proactive action to develop these systems will help to ensure property owners

² Resources are currently being published with a few offering more standardised responses and technically solutions for RAAC, such as [the RAAC Playbook developed by the Manufacturing Technology Centre](#).

³ [The Institution of Structural Engineers has developed technical guidance on RAAC](#), which could usefully inform the approach and guidance outlined in a national programme for RAAC.

⁴ [Scottish Law Commission, "Discussion Paper on Tenement law: compulsory owners' associations," April 2024.](#)

and tenants are well-supported financially, legally, and technically to undertake retrofit and repair works quickly and properly now and into the future.

System-wide changes are needed. These will take time and must be developed in collaboration with tenants, homeowners, professional bodies and practitioners to avoid sweeping and significant negative consequences to the financial, physical and mental wellbeing of these households.

Built Environment Forum Scotland (BEFS) written submission, 31 March 2025

PE2113/K: Provide support to RAAC-affected communities

Built Environment Forum Scotland (BEFS) is a charity and network of more than 40 Member bodies that are concerned with the protection and improvement of existing buildings in Scotland's cities, towns, villages and rural areas. BEFS debates and advocates on the strategic challenges and opportunities for Scotland's historic and contemporary built environment.

BEFS Members are keenly aware of general safety concerns regarding the use of Reinforced Autoclaved Aerated Concrete (RAAC) panels in Scottish buildings. The importance of responding swiftly and effectively to the need for action in maintenance, repair and renovation, where required, is vital. The significant financial and technical challenges that may act as a barrier to these actions must be overcome.

BEFS notes [the Scottish Housing Regulator's 2024 report on RAAC use in social housing](#), and the 13 social landlords that have identified RAAC presence in some of their stock in Aberdeen, Dundee, Edinburgh, Stirling and elsewhere. The 1,994 homes affected, and the 8,311 additional homes under investigation by 27 other social landlords at the time of the report, demonstrate a major ongoing challenge.

Key elements of the petition to the Scottish Parliament entitled, "Provide support to RAAC-affected communities" (hereafter PE2113), currently under consideration by the Citizen Participation and Public Petitions Committee, which focus attention on the situation and propose a set of actions to help resolve it, are therefore welcome.

BEFS shares the PE2113 proposers' main concern that people residing in homes with RAAC may be at risk of roof collapse, displacement, and/or financial ruin, through no fault of their own. The call for Scottish Government intervention is welcome in this regard. It is right that this intervention should explore the provision of funding support for affected tenants and owners.

Repairing and reusing RAAC-affected buildings is consistent with a wide range of national policy aspirations and National Performance Framework outcomes, including in the domains of community safety, housing, health and wellbeing, poverty and climate change. Interventions that save buildings and homes will make particularly notable contributions towards protecting our built environment, and securing a just transition to net zero.

Funding, however, is not the only barrier to the delivery of any RAAC-related remediation works. BEFS Members report particular concerns about skills capacity

and contractor availability, which is patchy nationwide, leaving some regions short of accessible expertise. In addition, data and research about Scotland's built environment, including accurate building condition surveys and post-occupation evaluations of repair and retrofit works, is lacking. As BEFS has previously stated in a submission to the Local Government, Housing and Planning Committee:

"The pressing issues around RAAC are the most recent reminder of the long-term costs associated with prioritising speed and novel technologies over quality in construction, and it is difficult to see how the scheme of remediation required can be financially supported.

"A focus on quality in construction and materials, lifecycle costs, and appropriate skills and training can ensure that we move beyond simply addressing the current problems and start a broader conversation about the importance of quality in construction for the long-term well-being and safety of our communities and places – not only to avoid repeating past mistakes, but also to ensure the long-term sustainability and resilience of our built environment."

Targeted additional investment in skills and research for the built environment sector will add value not only to RAAC-affected communities, but to the wider policy and practice landscape in building repair and maintenance. This will help address the issues around housing safety, comfort and maintenance central to the petitioners' concerns.

While BEFS has not consulted its Members on the PE2113 call for a public inquiry and the creation of a new register for high-risk buildings, it is believed they are unlikely to have a settled view. Previous BEFS network discussions have highlighted mixed views on public inquiries, as they are often lengthy and expensive, and may take focus and resources away from the pressing need for action and investment. The historical reality that RAAC has not been used as a building material for decades may add further expense and delays, and present practical difficulties in finding suitable witnesses and records.

The petitioners may be aware that Scotland has operated a Buildings at Risk Register (BARR) since 1990. [Following a 2024 review commissioned by Historic Environment Scotland, work on BARR is currently paused](#). BEFS notes the review's main finding, that BARR too often functions simply as a list, with insufficient evidence of impact in saving and productively reusing the buildings featured.

In much the same way that producing a task list is helpful only if it is followed up by efforts to carry out those tasks, a reopened BARR or a successor model should be more closely aligned with project-based activity that renovates and reuses damaged, derelict, and vacant buildings across Scotland.

By way of a final comment, further information on how, "a measure similar to General Product Safety Regulations" for building developers could be developed and implemented in practice would be welcome. BEFS is not able to comment at this stage, without additional detail on proposed legislation.

BEFS is appreciative of the opportunity to comment on petition PE2113 and looks forward to tracking its progress.

Petitioner written submission, 24 April 2025

PE2113/L: Provide support to RAAC-affected communities

We are grateful for the considered response from the Royal Incorporation of Architects in Scotland (RIAS), and we wholeheartedly agree with the call for a national, government-led remediation scheme and long-overdue reform in procurement practices. The parallels drawn with previous large-scale remediation efforts—such as the post-war PRC homes—are apt, and underscore the necessity for a well-funded, centralised programme to address the RAAC crisis.

However, while RIAS rightly highlights the urgency of immediate action, we respectfully submit that a public inquiry is **not** a distraction but an essential parallel step. Without an inquiry, we risk repeating the same systemic failures in future construction practices. It is not enough to acknowledge that "poor oversight" and "lowest cost materials" were favoured decades ago—we must understand **how** and **why** this persisted for so long, even as serious concerns about RAAC's safety became known.

A public inquiry will bring much-needed transparency and accountability to the way RAAC was handled by councils, housing associations, surveyors, and regulatory bodies—many of whom **do still exist in successor forms**, and whose current practices remain influenced by that legacy. Furthermore, an inquiry can explore why Scottish local authorities—unlike their counterparts in England—initiated secondary roofing projects over RAAC panels in the early 2000s. Were these decisions quietly intended to conceal, rather than address, known structural risks?

We agree that a review of procurement practices is vital, but we must also consider the lived experience of current homeowners—many of whom were never informed about the presence of RAAC in their homes. An inquiry offers not just a retrospective lens, but a platform for these voices, for evidentiary fact-finding, and for developing long-term safeguards.

Yes, inquiries require investment and time, but their role in rebuilding public trust and shaping safer futures cannot be understated. We cannot dismiss scrutiny simply because key actors have retired, or records are fragmented. On the contrary, those very gaps in accountability are why a statutory inquiry is needed.

Let us not choose between urgent action and long-term reform. Scotland can, and must, do both.

Response to PE2113/J: the Chartered Institute of Building Submission

We also welcome the Chartered Institute of Building's (CIOB) written submission and their recognition of the urgent need for government leadership and coordinated action in tackling the national RAAC crisis. Their emphasis on developing a national programme and the importance of funding, guidance, and systemic reform reflects many of the concerns raised by affected communities. However, while the CIOB focuses heavily on long-term structural change, there remains a pressing need for immediate action to support those already displaced and living in limbo.

The CIOB correctly identifies the inconsistency in current approaches across Scotland. However, they do not go far enough in calling out the consequences of these disparities. Many homeowners have now been out of their homes for over a year without meaningful updates, while properties continue to deteriorate—sometimes becoming unsafe or vulnerable to criminal damage. Acknowledging this frustration is not enough; urgent interim solutions must be developed, including clear timelines for assessments, temporary re-entry protocols for salvaging belongings, and emergency financial support for displaced residents.

The comparison to cladding is apt, and we would go further by urging policymakers to apply lessons learned from that crisis more rapidly. The protracted nature of cladding remediation and the psychological toll it inflicted should serve as a warning against allowing RAAC victims to suffer the same fate. We are particularly concerned about homeowners who are ineligible for council-funded works, excluded from tenders due to tenure status, or trapped with unsellable properties and unpayable mortgages.

The CIOB's endorsement of Compulsory Owners Associations (COAs) and legal reforms is a positive step for the future, but the lack of current legal tools must not be used as an excuse for inaction. Local authorities should be provided emergency powers and guidance to compel joint assessments in mixed-tenure buildings, with government underwriting the cost where necessary.

We echo CIOB's call for a national programme— but it must be shaped not just by professionals and policymakers, but also by the very communities affected. Those living through this crisis have valuable insights and deserve a seat at the table. Without their voices, any future framework risks being detached from lived reality.

We urge the Scottish Government to act now—compassionately, urgently, and transparently—to prevent this building crisis from becoming a humanitarian one.

In conclusion, it is clear that professional consensus exists: the Royal Institution of Chartered Surveyors (RICS), the Royal Incorporation of Architects in Scotland (RIAS), and the Chartered Institute of Building (CIOB) have all publicly called for the creation of a national fund to support RAAC-affected homeowners. These leading bodies recognise that without a centralised, government-backed funding mechanism, the situation will continue to worsen—particularly for those left displaced, financially burdened, and emotionally drained.

Yet, despite these repeated and authoritative recommendations, we are now over a year into this crisis and no national fund has been established. Homeowners remain in limbo, forced to watch their properties decay while they shoulder the burden of inaction. The lack of urgency displayed by the Scottish Government is unacceptable. Each day that passes without financial support intensifies the hardship faced by residents and widens inequalities in how this crisis is managed.

Scotland must now match professional recommendations with tangible action. The establishment of a national fund is not just an expert recommendation—it is a moral imperative. The time for talking is over. Homeowners need solutions now.