

PE2113/F: Provide support to RAAC-affected communities

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

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](#).