

# **PE2113/J: Provide support to RAAC-affected communities**

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

### **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.<sup>1</sup>

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,

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

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.

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.<sup>2</sup> 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.<sup>3</sup> 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**

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

<sup>3</sup> [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.

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](#)<sup>4</sup> 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 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.

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