

Ms. Ariane Burgess MSP  
Convenor  
Local Government, Housing and Planning Committee  
The Scottish Parliament  
EDINBURGH  
EH99 1SP

14<sup>th</sup> March 2025

Dear Ariane

### **RAAC AND DAMP/MOULD IN BUILDINGS – 18<sup>TH</sup> MARCH 2025**

Many thanks for inviting RIAS to give further evidence at next week's meeting.

Both issues being discussed have very serious implications for householders, particularly vulnerable individuals, and we endorse the approach being taken by your committee and the Scottish Government to address these. Nevertheless we think that more needs to be done to resolve the iniquitous position which the affected families find themselves in. In particular:

1. A UK-wide, grant funded remediation scheme based on the successful PRC programme of the 1980s has to be implemented as soon as possible, addressing the current funding deadlock and allowing repair works to move forward without delay. It is our view that current work on this should be accelerated to avoid further hardship on those in greatest need.
2. The retrofit of older rented properties to provide modern environmental standards and consequent reductions in heating costs has to accelerate, whilst also ensuring robust technical solutions and build quality lest we otherwise simply repeat the errors of the past. Whilst the focus is likely to be on social housing providers regard must also be had to the private sector.

Turning now to submissions made by other parties, there are some additional points which we think it important to raise.

### **RAAC**

It has been suggested that legislation should be considered similar to the English provisions of the Building Safety Act, extending the current periods of prescription and limitation to variously 30 or 60 years. Whilst we understand why this has been raised, RIAS considers that impracticable.

Firstly, such a change cannot be made retrospectively or it will be subject to challenge in the courts. It will therefore not assist the individuals currently affected.

Secondly, whilst insurance-backed collateral warranties do exist these typically have a ceiling of 10 to 15 years. Whilst new products could be developed, a significantly extended period of liability will carry with it significant cost. It is easy to see this being 5% or more and that will have an impact on the Scottish Government's ability to meet the current housing shortfall.

Thirdly, and perhaps most importantly, the Scottish Government is already putting in place measures to improve regulatory compliance including the proposed Compliance Plan Manager (CPM) scheme. In our view this – together with reforms to procurement which place greater emphasis on quality – are likely to be a more effective way of reducing the risk of future problems with latent defects. Such steps must include for independent expert scrutiny of work.

I would like to stress again that we believe that a remediation fund supported by a proportionate and reasonable levy across the newbuild sector is the most appropriate way for those individuals who, through no fault of their own, find themselves owning a property with very serious defects such as RAAC. The last such scheme worked successfully 30 to 40 years ago and there is no reason for it not to do so again.

## **DAMP AND MOULD IN BUILDINGS**

The RIAS makes regular use of the SHQS in preparing advice to members and considering how best to advise on policy matters. We have found it a useful resource. Although we note concerns amongst some stakeholders around practicality and enforceability, these largely lie outwith our professional remit and we leave it to others to provide you with evidence on these issues.

One area of concern reported by our own members is whether improvements actually deliver for tenants.

It may therefore be helpful to draw attention to the work taken by Janice Foster and her colleagues at the Glasgow School of Art/Mackintosh School of Architecture, in particular the post-occupation evaluations which they have undertaken on retrofitted sub-standard 1960s dwellings.

These studies found that, even where high levels of insulation were provided and build quality was good, the most vulnerable tenants – those on low incomes and potentially in their homes all day – encountered very significant challenges arising from energy costs. As a consequence many were unable to heat their homes above 19°C. Mechanical ventilation systems which were required as a result of improved airtightness were associated with additional, ultimately unaffordable, costs and were circumvented leading to problems. Whilst damp and mould levels reduced considerably, the problem nonetheless remained.

It is therefore our view that simply requiring the performance of the insulated building envelope will not be sufficient to address this problem for some in our communities. Fuel poverty remains a very significant part of the issue and steps need to be taken to help this vulnerable sector of the community. Only by taking both measures forward in tandem can we prevent more families suffering the potentially serious and long-lasting effects of sub-standard housing.

Please do not hesitate to contact me if it would be of assistance to discuss these or any other issues in greater detail and in the meantime I look forward to seeing the committee next week.

Kind regards,

Peter Drummond  
Chair of Practice, RIAS

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# RIAS

**The Royal Incorporation of Architects in Scotland**

Aonachadh Rìoghail nan Ailtire ann an Alba

## **Evidence Session with the Minister for Housing on Building Safety Issues in 2025**

The Royal Incorporation of Architects in Scotland (RIAS) is pleased to give written evidence to the Housing, Planning, and Local Government Committee ahead of their evidence session with the Minister for Housing:

### **Progress on RAAC**

Through no fault of their own, householders find themselves in an iniquitous position. We believe the central question is not whether there should be a remediation programme, but rather how this is best funded over the long term.

Sadly, the post-WW2 need for rapid reconstruction, with limited budgets, has led to a growing list of systemic failings, starting with the widespread use and subsequent removal of asbestos-based products. This includes large concrete panel construction and RAAC. Consideration should be given to whether dealing with RAAC should form part of a wider scheme addressing other similar latent defects such as cladding and those that are yet to emerge.

The RIAS believes it is inevitable that the programme of invasive inspections, which are now required, will reveal further related and unrelated repair issues affecting some types of buildings given their age and type of construction. We would welcome reassurance from the Minister that the scale and severity of the interrelated issues are understood, and the response at both UK and Scottish levels is sustained.

Our view remains that any remediation scheme should build upon the lessons learned from the successful UK-wide grant-assisted remediation scheme for precast concrete houses (for example, Dorrans units) which was implemented in the 1980s and 1990s. This ensured that, once works were complete, the properties were mortgageable and minimised the monetary impact on owners.

Since the committee last took evidence, there have been significant RAAC-related issues highlighted regarding cultural and civic buildings, including those valued by communities such as the Motherwell Civic Halls and Brunton Halls in Musselburgh. These are large purpose-built buildings of considerable architectural merit which will be technically difficult, if not impossible, to repair and challenging to replace, within the limited resources currently available to local authorities. Demolition should be a last resort given the financial and environmental cost of replacement. Strict application by local authorities of Historic Environment Scotland's guidance, most notably as set out in 'Managing Change: Demolition', is needed to ensure any final decisions are carefully considered in the round.

The RIAS believes that the demolition and replacement of such buildings erases the ongoing benefit of the legacy CO<sub>2</sub>(e) emissions associated with the original construction, hindering our response to the Climate Emergency.



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## Progress on Damp and Mould

We note that in June 2023 the Committee wrote to the Minister stating: “A key driver of damp and mould last winter was the inability of tenants to heat their homes in the context of the cost crisis.” This situation has not improved. We note **the** Scottish Fuel Poverty Advisory Panel - Workplan 2024-2025 - Fuel Poverty Scotland states: “*High energy prices are currently the primary driver of fuel poverty in Scotland.*”

Overall impact at household level is influenced by energy costs, disposable income and then the building's level of thermal efficiency. The older the property, and corresponding building regulations dictate the amount of energy and costs of achieving an acceptable level of comfort – unless the property has been upgraded to modern quality standards. Fuel price rises are now undermining the benefits of previous upgrade programmes. Clearly households have a much higher risk of cold homes, condensation, and mould because they must ration heating system use when the choice is between heating and eating.

Whilst the 2023 SCHS reports around 10% of all dwellings in 2023 suffered from some form of condensation or damp but these figures need to be broken down by types of dwelling age. Figure 1 extracted from the SCHS is illustrative of the problems, with reductions in condensation being reversed, even in relatively modern properties.

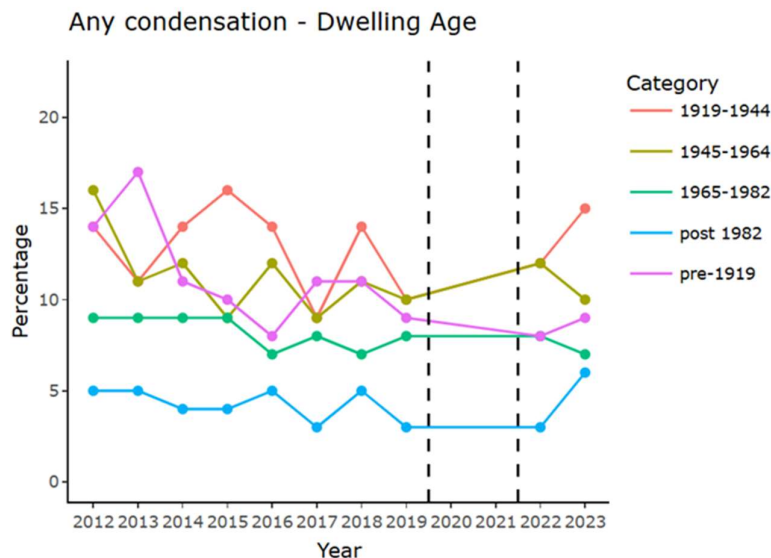


Figure 1: SCHS 2023

There is still significant scope to reduce the risk and severity of damp and mould given:

- The Scottish Housing Quality Standard (SHQS) failure rate in the social sector was 38%. Failures of the Energy Efficient criterion were the biggest driver of failures overall.



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- The SHQS failure rate in the private sector was 60%. In 2023, 35% of private sector properties did not meet the Energy Efficient criterion.

However, the RIAS cautions that whilst households face a choice between eating and heating, and crippling high energy bills, then progress will continue to stall – even as the housing stock is upgraded. The costs and technical challenges will increase as attention shifts towards pre 1960s stock (hard to treat), where internal and external wall insulation pose particularly challenges around moisture management and achieving installation standards. Members of the RIAS have already voiced concerns about how such properties are assessed and treated via mainstream programmes, with a future risk of damp and condensation being a concern.

### **Future progress concerns**

Evidence shows that to save energy, some vulnerable householders will close trickle vents, switch off fans, and keep windows closed to lower their bills. Such steps all compound condensation problems. Careful and sensitive education and communications are needed around such matters, given the drivers behind these behaviours and risks of victim blaming. It should never be forgotten that fuel poverty strips tenants of their ability to manage thermal comfort, including scope to manage condensation.

This context is a challenge given the direction of travel towards improved energy efficiency standards for new buildings which push ever tighter building performance to reduce heat losses through air changes, air leakages, and similar issues. This could necessitate the use of mechanical ventilation heat recovery (MVHR) in new buildings and eventually retrofit projects.

The RIAS is cautious about the implications of how this should be rolled out and communicated to the public. Correctly installed and operated MVHR significantly improves air quality, saves energy costs, and reduces dampness, but it is not a silver bullet. It is less effective in poorly-insulated buildings, relies on developing a supply chain for the technology, skilled installation, imposes an increased maintenance burden (fans and filters), and - critically – requires user acceptance/behaviour and education.

The technology and installation must be appropriate to the building, provision for maintenance put in place, and tenants must believe and understand the benefits, including lower bills as well as reducing moisture and causes of mould. Ignoring these challenges will result in negative reactions and unintended consequences in delivering future retrofit programmes. A cautious, nuanced approach is therefore required if we are not simply to repeat or worsen existing problems. Without due care, there is a risk of a future systemic failure as with asbestos, cladding or RAAC defects – where a programme of mass remedial action is then needed.