

Petition PE2113: Provide support to RAAC-affected communities

A BEFS submission to the Citizen Participation and Public Petitions Committee

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.

End of submission: to be published under the organisation's name, Built Environment Forum Scotland (BEFS)

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31 March 2025

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