SJHLG/S7/26/8/2

Social Justice, Housing and Local Government Committee
Wednesday 11 November 2026
8th Meeting, 2025 (Session 7)

Note by the Clerk

Housing Themed Stakeholder Evidence Session

1. At its meeting on 24 June 2026, the Committee agreed to hold a series of themed stakeholder roundtable evidence sessions to assist Members in developing their understanding of key issues across the Committee's remit. These roundtable sessions follow a series of evidence sessions with Scottish Government Cabinet Secretaries and Ministers, during which the Committee explored the Scottish Government's priorities and planned activity across the Committee's remit. The roundtable evidence sessions are intended to complement that evidence by providing Members with an opportunity to hear directly from a range of stakeholders and organisations working across those policy areas.
2. At its meeting on 09 September 2026, the Committee agreed to invite a selection of stakeholders to participate in two roundtable discussions on housing at its meeting on 11 November 2026 – one on housing supply, and the other on improving housing outcomes for individuals.
3. On the issue of housing supply, the Committee will hear from representatives of the Scottish Federation of Housing Associations, the Association of Local Authority Chief Housing Officers (ALACHO), Homes for Scotland and Scottish Land and Estates. On the issue of improving housing outcomes for individuals, the Committee will hear from representatives from the Scottish Association of Landlords, Living Rent, Rock Trust and Crisis Scotland.
4. SPICe has prepared a briefing for the Committee on housing. This briefing is included as **Annexe A** to this paper.
5. This evidence session will provide an opportunity for the Committee to explore key issues relating to its housing remit, including housing supply and delivery, homelessness prevention and response, the private rented sector, housing quality and standards, accessibility, and the challenges and opportunities associated with improving Scotland's housing stock whilst meeting wider policy objectives.
6. Witnesses were invited to submit a one-page briefing in advance of the session, outlining their organisation's priorities for Scottish Government action on housing supply and improving housing outcomes over the current parliamentary session,

including key issues, opportunities, challenges, and areas of concern that they consider relevant to the Committee's scrutiny work. Submissions made can be found at **Annexe B**.

Clerks to the Committee
November 2026

Annexe A: SPICe Briefing on Housing

Introduction

This briefing provides background for the Committee's roundtable discussion on housing. The purpose of the meeting is to consider stakeholder views on housing priorities. This will help inform the focus of the Committee's scrutiny of housing issues during Session 7.

Background

For general background information, SPICe has published a Housing Subject Profile overview briefing (this also includes a brief overview of homelessness policy) and an updated briefing on the Affordable Housing Supply Programme.

The Scottish Government's Programme for Government 2026-2031 outlined the government's ambitions for housing around:

- Ensuring more people get an affordable home
- Ensuring the right housing mix for Scotland
- Ending homelessness for good

The Committee took evidence from the Cabinet Secretary for Social Justice and Housing on 16 September 2026.

Housing supply

Housing supply and the housing emergency continue to be major challenges in Scotland.

In May 2024, the Scottish Parliament declared a housing emergency, with a further fourteen local authorities making similar declarations. The underlying reasons for this include a shortage of affordable homes, growing homelessness pressures, rising housing costs, and wider economic factors such as increasing construction costs and wages failing to keep pace with rents and house prices.

The Scottish Government's Housing Emergency Action Plan, published in September 2025, sets out measures to address these challenges. Its priorities include ending the use of unsuitable accommodation for children, supporting vulnerable communities, and increasing investment in housing.

The supply of new homes has declined. Recent statistics show that there were just over 17,000 new homes built and 15,500 homes started in the twelve months ending June 2026. Compared with the previous twelve-month period, newbuild completions fell 11%, and starts 2%. Completions were at their lowest level since 2015 and starts since 2013.

Several factors influence the supply of new homes, including:

- the availability of land
- finance, including level of public subsidy for affordable housing
- the capacity of the construction sector and construction costs
- enabling infrastructure such as sewerage and roads
- housing market conditions and viability of developments

The Scottish Government has undertaken a range of actions to facilitate new supply. These include:

- An ongoing commitment to deliver 110,000 affordable homes by 2032. The Scottish Government increased the Affordable Housing Supply Programme budget to £926 million in 2026-27 (a real terms 14% increase from the previous year) and committed to a 4-year £4.1 billion public sector investment programme.

  The Programme for Government outlined that since 2007, the Scottish Government has delivered 146,034 affordable homes, with affordable housing supply proportionately 45% higher than in England and 69% higher than in Wales, per 10,000 population. When the Cabinet Secretary for Social Justice and Housing spoke to the Committee in September, she acknowledged the targets were challenging but the government was "working to achieve them".

  The average cost to deliver an affordable home and the proportion funded by a Scottish Government grant has increased over the years. In 2019-20, the average cost of an RSL social rented home (at tender approval stage) funded through the AHSP was £158,000, with a Scottish Government grant funding 56% of costs. In 2023-24, the same cost was £198,000 with a Scottish Government grant funding rate of 62%. An ongoing theme has been the need for social landlords to balance increasing costs of developing new homes with the need to maintain existing stock while keeping rents affordable for tenants.

- The housing emergency action plan set out a new "all-tenure delivery ambition, working with the housebuilding sector to increase delivery across all sectors by at least 10% each year over the next three years." As noted above, the latest statistics show that all tenure completions have dropped.

- The establishment of More Homes Scotland, a new national housing agency "with a focus on simplicity, scale and speed to enable the delivery of housing of all types, helping to meet housing need across Scotland." It will be developed in partnership with the Scottish National Investment Bank (SNIB) and COSLA. It is expected to start operating from 2027-28 and be fully functional in 2028-29. The Programme for Government states that this will, "bring together funding, expertise and delivery tools under one roof. It will remove barriers and accelerate housing delivery, improving the use of public investment, unlocking private finance and supporting more homes, faster."

The Programme for Government also states that the Scottish Government will:

- "Work with local and regional partners to ensure the right mix of housing in the right places: aligned to housing need and our broader ambitions on regional growth and with housing provision supporting areas of new jobs and investment.

- Reform the planning system: to speed up developments and make it easier to get projects to completion and families into homes.

- Develop a strategic partnership between More Homes Scotland and the Scottish National Investment Bank (SNIB): leveraging further private commercial capital and investment into housing - supporting new entrants, growth and delivery of more high-quality housing across all tenures, including Build to Rent and affordable and social housing"

The Minister for Public Finance wrote to the Committee on 9 October 2026 outlining the crossover work between the planning directorate and the housing directorate regarding planning system constraints on housing delivery. It outlined that some challenges were outwith the control of the planning system, for example, decisions as to when build takes place on a site with permission is largely for the development industry:

> "Work on stalled housing sites and associated brokerage enabled a better understanding of challenges faced. Whilst there are some specific planning challenges around resource and skills for development delivery, key issues of infrastructure provision, including education, transport, flooding and drainage, and their impact on development finance and financial viability of proposals was evident. Joint working across stakeholders also made clear matters that are not within the control of the planning system, for example decisions on if and when permissions in place are built out – these are largely for the development industry. The learning from the stalled sites work is informing the role and functions of More Homes Scotland."

Homelessness

The Scottish Government and its local authority partners are committed to ending homelessness in Scotland.

Pressures on the homelessness system are one of the reasons underlying the declaration of the housing emergency. The Scottish Housing Regulator has identified two councils with systemic failure in their homelessness services and a further nine at heightened risk. By systemic failure, the Regulator means that the demand for homelessness support, both the number of people needing help and the complexity of their needs, continues to exceed local authorities' capacity to respond.

There have been record numbers of households living in temporary accommodation.

Councils are working to reduce the number of people living in temporary accommodation.

Homelessness statistics for 2025-26 showed a slight increase in the number of homelessness applications and households assessed as homeless from the previous year to 41,443 and 35,002 respectively. There was a decrease in applications from British, EU, EEA or Swiss citizens and those not eligible with an increase for other eligibilities, which includes refugees and those with leave to remain status. Increasing number of refugees presenting themselves as homeless has particularly affected the homelessness situation in Glasgow.

Preventing homelessness has been a key focus of Scottish Government policy. The Housing (Scotland) Act 2025 includes measures to strengthen prevention, including a new "Ask and Act" duty on relevant public bodies, such as local authorities, health boards and the police. If staff in one of these bodies believe that someone they are supporting is homeless or at risk of homelessness, they must ask about the person's housing situation and take appropriate action. These provisions will be in force by the beginning of November 2028 at the latest.

One of the issues that arose during scrutiny of the homelessness prevention legislation in the previous parliamentary session was the need for public bodies to be adequately funded and trained to implement the homelessness prevention new duties. The Scottish Government has funded homelessness prevention pilots to test the new duties. A recent announcement indicated that the pilots will be extended to the end of March 2027.

The Programme for Government outlined that the Scottish Government's approach to homelessness:

> "….will shift from crisis management to prevention and rapid rehousing so that everyone has a safe, secure and affordable home in which they can thrive.

> We will do all we can over this Parliament to help people off the streets and end the use of unsafe and harmful temporary accommodation for children. Support for care-experienced young people to access secure long-term housing will be strengthened and, under new standards, we will ensure homes are designed and adapted to meet people's needs, reducing physical barriers and enabling disabled people to participate more fully in daily life.
>
> We will transform how public services work together and embed housing stability as a shared responsibility, ensuring people receive the right support at the right time and increase the supply of affordable homes in the places they are needed to end homelessness for everyone."

Specific policies mentioned in the Programme for Government included rolling out the Homelessness Prevention Fund of £50 million over 10 years, supporting families impacted by the UK Government's freeze on Local Housing Allowance rates and supporting local authorities to deliver 1,500 Housing First tenancies over five years.

Private rented sector tenants and landlords

Around 13% of Scotland's housing stock is privately rented. The previous Scottish Government sought to improve private tenant's rights while maintaining a balance with landlords' rights.

The Scottish Landlord register database shows that in September 2026, 230,374 landlords were registered and 349,800 properties were registered, a decrease of just over 9,000 landlords and an increase of just over 10,200 properties since January 2022. Note that there are some limitations of this data source. For example, registrations last for a period of three years and there could be a time lag in landlords de-registering properties which are no longer available for rent.

The Housing (Scotland) Act 2025 will give private tenants new rights, for example, by making it easier to keep pets and personalise their homes. These provisions are not yet in force.

The 2025 Act also sets out a framework for the potential introduction of rent control areas. This process starts with a local authority assessment of rent conditions in its area. The first assessments must be submitted to the Scottish Government by the end of May 2027. At this stage, it is therefore not clear whether any rent control areas will be established. Regulations were passed to exempt certain mid-market rented housing and build to rent housing from any rent control areas.

One of the issues that arose during scrutiny of the legislation was the need for robust data to inform rent assessments. The Scottish Government has published guidance for local authorities on rent assessments.

The previous Local Government, Housing, and Planning Committee noted the importance of good advice for private tenants and private landlords. It also heard of some of the difficulties which tenants face in taking cases to the First-tier Tribunal (Housing and Property Chamber), and landlords also told the Committee that when they need to take a case to the Tribunal, the timescales are very lengthy. The Tribunal considers private rented housing disputes while social housing cases are heard by the Sheriff Court.

Other future planned developments include the Scottish Government's plans to engage with stakeholders on its proposal to enable private rental tenants to purchase the property they rent if the owner chooses to put it up for sale and a review of eviction grounds for private residential tenancies.

Housing standards, safety and quality

In the last parliamentary session, legislative changes sought to bring the house condition standards for social and private rented housing closer together, for example, by the extension of the Repairing Standard for private landlords and by the introduction of common fire and carbon monoxide safety requirements. The Scottish Government also has a programme to support owners of buildings affected by dangerous cladding.

There has also been an increased focus on the issue of dampness and mould in rented housing. From October 2026, social and private landlords must comply with new regulations that require landlords to investigate reports of damp and mould and begin any necessary repairs within set timescales, unless they are unable to do so for reasons outwith their control (this is known as "Awaab's law"). Further details are in a SPICe blog on the topic.

Other developments include:

- **Reform of tenement law**: There has also been work ongoing to consider potential reforms to tenement law, recognising that the current system is not enabling a proactive approach to arranging and financing the maintenance of Scotland's housing stock.

- **Accessibility**: the Scottish Government is committed to making accessibility a mainstream feature of all new homes. It is reviewing the Housing for Varying Needs design guide (aimed at affordable housing) and is progressing its commitment to deliver a new all-tenure Scottish Accessible Homes Standard through updates to building standards and guidance.

The Scottish Government's climate change plan notes the need for at "transformational change to the way in which we heat our residential and public buildings is essential to meet our net zero target – transitioning to clean heating by 2045 and reducing the

energy required for heating." A range of Scottish Government policy has been implemented or proposed to facilitate the heat in buildings agenda. This includes:

- Introduction of new build heat standard which requires new buildings to install climate-friendly heating systems instead of oil and gas boilers.
- Consultation on plans for a Scottish equivalent to the Passivhaus standard. A stage 2 consultation has recently closed, with a planned implementation date of August 2029.
- Development of a Social Housing Net Zero Standard (SHEES). This has been under development for some time. The Scottish Government plans to finalise this by April 2027.
- Previous proposals for private landlords to ensure their let properties meet minimum energy efficiency standards. It is not yet clear how this will be taken forward A Scottish Government Heat in Building bill is expected in year 1 of the parliament.

Responsibility for the Scottish Government's Heat in Building agenda lies with the Minister for External Affairs and Energy, Stephen Gethins MSP and is scrutinised by the Economy, Tourism and Energy Committee. The above is mentioned here in the context of some comments made in the witness submissions about the impact of such requirements on new housing supply.

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The Scottish Parliament, Edinburgh, EH99 1SP www.parliament.scot

Annexe B: Stakeholder Written Evidence

Scottish Land and Estates – November 2026

During the current parliamentary session, SLE's priorities for Scottish Government are to unlock rural housing delivery, protect existing rented housing supply and ensure policy reflects rural needs. Rural housing is essential economic infrastructure for businesses, communities and public services. The Committee's scrutiny should examine barriers to delivering more homes alongside policies that risk removing existing homes from the rented sector.

Unlock Housing Delivery
Many housing projects are delayed not by a lack of willingness to build, but by the complexity and timescales of the delivery system which add cost to projects.

Priority actions:
- Improve the speed and efficiency of planning decisions.
- Reform the consultee process so that requirements are proportionate to the project and decisions take rural context into account.
- Reduce reliance on desktop assessments that can generate unnecessary costs and delays.
- Faster funding approval process.
- More efficient procurement processes.

Committee consideration:
Scrutiny should consider the full project timeline. Where are the biggest delays occurring between project conception and completion, and what reforms would have the greatest impact on delivery times?

Protect Existing Rented Housing Supply

Housing supply is not just about new homes. Retaining rented homes within the system is equally important because not everyone is able to, or wishes to, own their home.

Priority actions:
- Assess the cumulative impact of regulation on the viability of the private rented sector.
- Consider the consequences of continued loss of privately rented homes, particularly in rural areas where alternatives are limited.
- Avoid policies that further reduce confidence in providing rented housing.
- Carefully assess the impact of any additional tax burden on property income alongside existing regulatory pressures.

Committee consideration:
Committee consideration: What are the individual and cumulative effects of current and proposed regulation and the possible additional taxation of property income on the viability and availability of rented housing? Which changes would protect existing supply, particularly in rural areas where the trend of decline appears to now be established?

Recognise the Distinct Needs of Rural Housing
Rural housing faces unique challenges but is fundamental to rural economic sustainability.

Priority actions:
- Value housing as an enabler of economic growth and population retention.
- Ensure housing policy reflects rural circumstances.

- Maintain support for organisations that provide expertise to rural housing projects.

Committee consideration:
How will the Scottish Government secure continuity of specialist support for rural housing projects? The future of organisations such as the Community Housing Trust is a particular concern: these bodies help communities navigate complex development and funding processes, and SLE sees no obvious replacement if that support is lost.
Conclusion
Rural Scotland does not lack opportunities to deliver housing. Where viability challenges can be addressed, projects are often slowed by planning, procurement and funding processes, while existing homes continue to leave the rented sector due to the cumulative regulatory burden relative to the returns that can be achieved from many rural lets.

The Committee's scrutiny should focus on the practical factors that determine whether homes are delivered and retained. This means examining delays within the development process, the pressures driving existing homes out of the rented sector, and the future of the specialist organisations that help communities navigate an increasingly complex housing delivery system. Progress on housing supply will depend not only on housing targets, but on the effectiveness of the wider delivery infrastructure that supports them.

Scottish Federation of Housing Associations – November 2026

1. Social and affordable homes are an investment in essential national infrastructure, supporting better health, homelessness prevention, local economies and sustainable communities.
2. Balancing the costs of development and the affordability of rents is the central challenge of housing association viability – this has become increasingly difficult in recent years.
3. The whole picture needs to be considered – all new policies or standards need to be looked at in terms of the impact on supply, rent affordability, and the cumulative, rather than standalone, costs.

Affordable Housing Supply Programme

- Scotland needs 15,693 new affordable homes annually during this Parliament, predominantly for social rent. Meeting that need requires estimated AHSP investment of £8.2bn, or £1.64bn a year.[1] This is compared to the current AHSP commitment of £4.1bn over four years. We are currently delivering 6-7,000 affordable homes per year. This is well below the rate needed for Scottish Government to meet its own targets.[2]

[1] SFHA - AHSP Report - A4 2.pdf
[2] sfha-spending-commitment-analysis_0.pdf

- The fundamental issue is that costs have increased at a rate that rents can and should not, in order to keep them affordable to tenants, and that grant benchmarks and the AHSP budget have struggled to plug the gap. Ten years ago, it cost £120,000 to build an RSL social rent home. Average costs are now roughly £250,000, £280,000 in Glasgow, and upwards of £320,000 in remote and rural areas.
- We are still seeing the consequences of the 26% cut to the AHSP budget for 2024/25. The reversal of that cut and introduction of multi-year certainty have helped restore confidence, and the lesson of that mistake must be learned. Development pipelines cannot simply be turned on and off depending on budget cycles.
- The current £4.1bn public investment commitment over four years must be treated as a floor and protected from wider pressures on Scotland's capital budget. The Scottish Government must now establish a route towards the evidenced annual requirement of £1.6bn per year.

More Homes Scotland:
The Committee should judge the new agency against one central test: does it increase the supply of the right homes, in the right places, particularly homes for social rent? MHS should provide a system which aligns land, infrastructure, planning and funding to strengthen delivery capacity, provide long-term certainty, and minimise development risk. Before launching in April 2027, the committee should seek a clear implementation plan, governance and performance measures, and a formal route for RSL involvement.

Section 75 - three improvements that we would like to see applied by Local Authorities:

- Remove developer contributions levied on social/affordable housing;
- Include a Mortgagee Exclusion Clause into S75s to increase borrowing capacity;
- Consistent guidance for when RSLs are brought into the S75 process.

Passivhaus equivalent - Increasing energy standards would increase risk and costs and hamper the development viability of affordable housing. In the context of the current housing emergency, proposals to increase energy standards should not be taken forward in this Parliament. More details on SFHA's position can be shared.[3]

Social Housing Net Zero Heat Standard - Whilst investment in existing homes is uncertain due to unknown standards and costs, so too is investment in new supply. Recent analysis from the SHR demonstrates this point.[4] We need a finalised standard by Spring 2027 and costs which do not impinge too heavily on supply.

[3] Passivhaus-equivalent impact assessment 'fails to consider added cost on new homes' | Scottish Housing News
[4] summary-of-registered-social-landlord-financial-projections-202526-202930.pdf

Accessible Homes Standard – This will be proposed in 2027, and while SFHA supports improved accessibility and adaptability, additional space and access requirements must be balanced with the impact on supply and rents.

Building Safety - Meeting the cost of building safety issues will impact on housing association's ability to build homes if they are left to cover the cost. Government must provide a timely, transparent route to grant funding for external and internal defects identified through Single Building Assessments.

Homelessness – New social and affordable housing supply is fundamental to ending homelessness. We cannot allocate our way out of a shortage of homes. Housing associations already contribute significantly through lets to homeless households and people at risk of homelessness, as well as wider tenancy sustainment.[5] Prevention must be properly funded, whilst acknowledging new supply is critical to the prevention agenda.

Crisis Scotland – November 2026

In May 2026, Crisis Scotland published our policy report on ending to all forms of homelessness in Scotland, for good, by 2040. Following consultation with political party representatives and those working in sectors that are close to the issue of homelessness, Crisis considered this date to be ambitious but achievable and has been publicly backed by parties elected earlier this year.

To end homelessness by 2040, we set out key policy areas to progress during this parliamentary session. They are to deliver the right number, of the right type of **homes**, in the right places, and to improve the support available to people in housing need to **prevent homelessness** where possible and **rapidly rehouse** people if they do become homeless. We also stressed the importance of strategic, long-term funding assigned to clear outcomes to make this achievable.

In Programme for Government this year, the First Minister reiterated his commitment to end homelessness for good for everyone, and he committed to shift from crisis management to prevention and rapid rehousing in this parliamentary term, which we strongly believe will achieve better housing outcomes for Scotland.

1. **Deliver the right number, of the right type of homes, in the right places**

There is broad agreement that more social homes must be provided – quickly and at scale, across Scotland (15,693 social homes are required to meet current, and projected future, demand). Moreover, the delivery of this must fall under More Homes Scotland’s stewardship. However, in isolation, this will not be sufficient to end homelessness. New homes, of all sizes, across different tenures, to meet the needs of

[5] Report

all of people who experience homelessness – from single people to large families – must be delivered. In addition to the right number, of the right type of homes, in the right places, Crisis Scotland also recommends the following are actioned:

- Local strategic investment decisions to be informed by local homelessness needs assessments, with the Scottish Government enabling local authorities to undertake the work necessary to achieve this. This ensures that local housing needs assessments and local strategic housing investment plans are better aligned so local future supply meets current and future housing need.
- Scottish Government produce a private renting strategy for Scotland to understand the role private renting can play in ending homelessness and providing housing security, if the goal is to increase its size or reduce it, and how private renting should operate alongside social housing.
- Additional support for low-income households in private rented accommodation is provided such as 'Help to Rent' schemes and tenancy deposit schemes.

2. **Improve the support available to people in housing need: prevention and rapid rehousing**

Prevention

Crisis Scotland's latest report, *Changing Course*, refers to the need to reform public services so that people get the support they need much earlier and are therefore able to stay in their home. The report provides a series of recommendations for Scottish Government to take forward to prepare the systems and infrastructure in preparation for the commencement of the new legal duties, Ask and Act, in November 2028. If successful, this new way of supporting people will create **greater household stability and ultimately reduce inflow in the homelessness system**.

To achieve this, Crisis Scotland is calling for:

- A clear, and costed, delivery plan for public services to work better together to implement the new homeless prevention legal framework.
- Cross portfolio leadership; setting out a clear vision of success and related milestones
- A new national data sharing system and fit for purpose IT systems
- A national training and workforce development plan, designed by people with experience of homelessness.
- Scaling up of the existing Ask and Act pilots to share learning and best practice nationally and use it in shaping guidance and secondary legislation.

Rapid Rehousing

For those that do become homeless, a ‘rapid rehousing’ approach should be taken by councils, to move people into settled housing more quickly and provide any necessary help people may need to keep that home. Rapid rehousing has been committed to in Scottish Government’s 2018 action plan to end homelessness, and councils have received ‘transition’ funding for several years. It is unclear how successful this transition has been due to limited monitoring and ultimately the absence of a clearly articulated end point – how councils know when they have fully transitioned to this new way of working. The lack of available supply in recent years has also significantly undermined efforts to shift to a rapid rehousing approach.

Housing First is a specific programme of rapid rehousing for people with more complex support needs. It has proved highly successful with tenancy sustainment outcomes of 86%, but current demand far outstrips what is available (9% of need met), despite government having committed to its national rollout.

3. **Strategic, long-term funding assigned to clear outcomes**

Shifting from crisis management to prevention and rapid rehousing is expensive and will require investment. However, the cost of not doing so is also extremely expensive, mainly financing systems failure, and the human cost is immense.

Long-term, multi-year budgets are needed. The Scottish Government must prioritise investment in the Affordable Housing Supply Programme and prioritise investing in a new prevention and rapid rehousing support system. More detailed costings can be found in our latest Changing Course report, including the estimated net cost avoidance of investing in prevention. With regards to funding, we also recommend consideration is given to:

- Cross portfolio investment and expenditure, with an exploration of pooling budgets
- Greater attention given to establishing clearly defined outcomes to guide expenditure and track impact
- Exploring what benefits could be delivered from adopting a payment by results model for securing improved housing outcomes.
- Targeted and protected (ringfenced) spending

Following the Scottish Parliament elections, we have been pleased to see some progress already. For example, the homelessness prevention pilots have been extended until the end of this financial year, and we are encouraged that the evaluation of the pilots should be made available by next summer. Ending homelessness for good

must be a cross-sector, cross-party, cross-portfolio endeavour for it to be successful. The recognition that public service reform is integral to ending homelessness is therefore very welcome and the link between the two agendas must remain strong.

Scottish Association of Landlords – November 2026

Amid the ongoing housing emergency, the need for more housing to be made available for individuals and families has never been more acute. The Scottish Association of Landlords believes the Scottish Government can improve housing outcomes by taking actions which build confidence in the private rented sector (PRS) so that we can increase the availability of housing in the sector and create a housing market that works for all.

To that end, we propose that the Scottish Government should:

1. Publish a PRS strategy which recognises the important role the sector plays in Scotland's housing market and outlines the Government's vision for what proportion of the housing market the PRS should comprise. This would allow landlords to make more informed decisions when considering whether or not to invest in the sector, and allow policy makers to ensure that policy interventions are appropriate to the future of the sector.
2. Commit to proportionate legislation which balances the needs of landlords and tenants, including secondary rent control legislation which ensures landlords who have kept their rent significantly below market value to assist their tenants, are not prevented from resetting the rent to market value for the next set of tenants. This would allow landlords the flexibility to discount rents for their tenants at times of financial distress without jeopardising the landlord's ability to receive a sustainable return on investment in the longer term.
3. Focus on the enforcement of current legislation rather than introducing new requirements in the sector. There is firm evidence that small scale landlords are exiting the sector with landlord registration data showing a drop of nearly 10,000 in the number of landlords operating in the PRS since January 2022. Surveys conducted by SAL and other organisations have shown that increasing regulation in the sector is one of the main reasons for landlords choosing to exit the sector.
4. Properly resource and seek efficiencies in the housing tribunal to reduce the unacceptably long wait times that landlords and tenants currently experience when raising an action. Tribunal cases are now typically taking 5 months longer to determine than they were when the tribunal was first established, which is putting strain on all those involved in the process.
5. Abolish the LBTT Additional Dwelling Supplement, which acts as a barrier to investment in the sector, and commit to work with the UK Government to abolish the section 24 changes to the taxation of mortgage interest, which have rendered many landlords' businesses financially unviable.
6. Work with the UK Government to ensure that local housing allowance rates are raised annually in line with rental growth, to ensure that the most vulnerable in society are not priced out of the PRS.

7. Invest in social housing to ensure there are affordable housing options for households at all income levels and prevent the PRS being used to house those who struggle to afford private rents.
8. Ensure landlords are given sufficient lead time to comply with a future minimum energy efficiency standard and that suitable exemptions and financial support are in place to ensure this legislation is balanced and proportionate.
9. Progress proposals to reform Scotland's tenement law, recognising that the current system is not enabling a proactive approach to arranging and financing the maintenance of Scotland's housing stock.
10. Continue to invest in the good work carried out by the Empty Homes Partnership to reduce the proportion of homes which are unoccupied.

Homes for Scotland – November 2026

Homes for Scotland (HFS) represents home builders and supply chain companies which together build the vast majority of all new homes built across the country across all tenures. We welcome the opportunity to give evidence to the Social Justice, Housing and Local Government Committee on behalf of the sector to discuss how Scotland can address the country's chronic undersupply of housing. With Scotland in the third year of a national housing emergency, sustained collaboration between Parliament, government and those responsible for delivering new homes of all tenures is essential.

At the time of writing:

- All-tenure starts fell from just over 22,000 in 2022 to just under 15,000 in 2025. Completions have followed the same downward trajectory, falling 11% in the year to June 2026.
- Local housing planning applications are averaging 19.4 weeks, with major applications at 44 weeks, compared with the 8-and 16-week respective statutory periods for determination.
- Four consultations on new building regulation, which will increase the costs of building a home, are underway or expected imminently

HFS welcomes the Scottish Government's commitment to taking an all-tenure approach in its Programme for Government, including measures intended to accelerate planning, help for First Time Buyers through the First Homes Fund and the development of the More Homes Scotland agency. We also recognise the challenging mandate set by the First Minister to ensure that planning acts as a catalyst for economic growth, and the Programme for Government 2026 to 2031 commitments that "planning and regulatory reforms will streamline housing delivery, speed up decision making and remove barriers to building new houses across the country".

Turning that ambition into additional homes will require pragmatic decision-making that improves confidence, releases deliverable land and restores viability. HFS believes

these must be fundamental issues the forthcoming More Homes Scotland agency must be able to intervene in and resolve.

Our asks of both Parliament and the Scottish Government are therefore focused on prioritising understanding of, and action to, unlock land supply and development viability. Both are deeply constrained, negatively impacting current and future housing delivery across all tenures. Addressing these barriers would help reverse the recent decline in housing delivery and realise the Scottish Government's own ambition to increase all-tenure delivery by 10% year-on-year.

Development Viability

A planning allocation or permission does not in itself make a development viable. A determination that a project is not viable can take place before a planning application is lodged, or after planning consent is granted.

HFS therefore asks the Social Justice, Housing and Local Government Committee to deepen its understanding of development viability and the commercial realities of home building, enabling it to undertake further work examining the impact of Scottish Government regulatory costs on housing delivery. The fundamentals of understanding viability are as follows:

- If the costs of building a home are greater than the income, it will not be built. Sales/rental income, land value, build costs, finance, policy obligations and infrastructure requirements determine whether a site proceeds. These vary by location, development type and market conditions.
- As a result of rising costs, including those associated with satisfying planning conditions and regulatory requirements, a home can be determined as unviable after it gains planning consent; if it is determined that the costs cannot be absorbed by the purchaser it is unlikely to be built.
- Brownfield remediation, new developer obligations, unexpected infrastructure costs and the cumulative cost of regulation can render a marginal site unviable that cannot proceed to planning application or construction.

The cumulative cost of regulatory change is placing increasing pressure on development viability, with HFS member evidence estimating **that regulation introduced or proposed since 2021 adds approximately £37,000 to the cost of delivering each new home.**

Forthcoming regulation includes:

Building Safety Levy	April 2028	c.£4,000	private
Accessible Housing Standard	April 2028	c.£4,000	private
Scottish Equivalent to Passivhaus Standard	Autumn 2029	c.£6,800	all tenures
Biodiversity Metric	TBD	TBD	all tenures

HFS welcomes the commitment in the Programme for Government that the Scottish Government wishes to "Reduce business bureaucracy and ensure regulation is designed in accordance with our Better Regulation principles – where we regulate last, regulate simply, and regulate flexibly." In the UK Budget 2026, the UK Government pledged to make no new building standards regulation until the end of the Parliament. At the same time the Office for Budget Responsibility has, in England, determined *"the cumulative effect of regulatory and fiscal changes outside the planning system over the last decade, particularly since 2019... have increased the cost, complexity, and timescales associated with residential development…. Taken together, these measures appear to have weighed on housebuilding activity".*

The Scottish Government must now provide the same certainty and **commit to no new regulation** in support of its own all-tenure housing ambitions.

As a priority, immediate clarity is required that the proposed **Scottish Equivalent to the Passivhaus Standard** will not be progressed further. HFS recently joined with social/affordable housing partners in Scottish Federation of Housing Associations and Glasgow West of Scotland Forum of Housing Association, calling for no change in the standards. HFS members estimate it will add approximately **£6,800 per home**, despite the limited additional emissions reductions anticipated. New homes built today already achieve high energy performance and comfort, with carbon emissions from the average new-build home having fallen by around 80% since 1990.

HFS has called on the Scottish Government to ensure that the forthcoming **More Homes Scotland agency has sufficient commercial understanding and expertise,** across its Board and workforce, to ensure it can intervene in, and learn from viability constraints.

Land Supply

Scotland does not have a sufficient pipeline of genuinely deliverable housing land; while HFS has not been invited to participate in the Committee's planning roundtable, it is imperative that we raise member concerns in this area.

HFS research demonstrates that Scotland faces a critical shortage of deliverable housing land, with the transition to new Local Development Plans (LDPs) creating a significant gap in the development pipeline. Without intervention, sites capable of delivering much needed homes risk remaining unavailable for development until proposed LDPs are published, with further delays before construction can begin. For context:

- 22 local development plans (LDPs) across 34 planning authorities are out of date and only 17 LDPs programmed to be updated by the May 2028 deadline.
- HFS analysis of 24 housing land audits found only 113,879 of 218,703 homes programmed for delivery were on sites controlled by home builders. Of those, 64,532 were already under construction.
- Only three proposed plans have been published; HFS is concerned many will now not be published until after the local elections in May 2027.
- Based on previous expected LDP adoption dates HFS estimates that new allocations will, on average, begin delivering homes in 2033/34. LDP adoption timelines have slipped.
- The lack of effective transition has increased competition for viable land; HFS now predicts a worst-case scenario in which housing completions could fall to 5,000 homes per annum.

HFS recognises that the Chief Planner's letter of 19 March 2026, which expects that significant weight should be given to Proposed Plans in decision-making, has yet to be sufficiently tested. HFS has tabled with the Scottish Government a range of actions, as part of its work to inform its **100-day commitment to reform the planning system**; these proposals would create the conditions to test this expectation. In summary, our key asks would set incentives (and penalties) to increase the supply of land and the speed of decisions through:

- an emergency land release, where an LDP is out of date and a proposed plan is not expected until 2029,
- a new expedited process for Ministerial call-in on housing sites, and
- a reformed scheme of delegation for Councils after the local elections.

HFS has previously asked for the re-introduction of the presumption in favour of sustainable development. The Scottish Government has been clear that they do not intend to do so. In its absence, HFS recognises that the Chief Planner's letter offers an

small element of encouragement to homebuilders considering investing in an allocation within a Proposed Plan, the HFS proposals seek to create incentives for LPAs to make decisions quicker while also bringing forward non-allocated sites in a more controlled manner.