

The Chartered Institute of Building (CIOB)

submission to

Scottish Government

on the consultation

Accelerating home-building in Scotland

April 2026

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Introduction

The Chartered Institute of Building (CIOB) welcomes the opportunity to respond to the Scottish Government's consultation on accelerating home-building in Scotland.

CIOB is the world's largest and most influential professional body for construction management and leadership. We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we have been doing so since 1834. Our members, over 2600 of whom are in Scotland, work across the built environment in the development, conservation, and improvement of housing and infrastructure. We accredit university degrees, educational courses and training, and develop policy positions, recommendations, and research based on evidence and best practice.

As a chartered professional body, CIOB acts in the public interest to promote the highest standards of quality, safety, and professionalism across the construction sector.

CIOB supports the Scottish Government's ambition to increase the pace and scale of housing delivery. We recognise the urgency of Scotland's housing challenges and welcome the focus on identifying measures that may help to accelerate development.

However, while some of the levers proposed in this consultation may have merit and contribute to improvements in particular circumstances, we are concerned that the consultation's overall approach is too narrowly focused on individual interventions intended to influence build-out rates. In our view, this does not sufficiently engage with the more fundamental and systemic barriers affecting housing delivery in practice.

Background and key points

The consultation acknowledges that the barriers to housing delivery are fundamental, longstanding and complex, and that no single solution can resolve them quickly. CIOB agrees with this assessment.

In our view, the principal constraint on housing delivery is not simply the pace at which consented sites are built out, nor a lack of willingness on the part of developers to deliver homes. Rather, it is the fragmented nature of the housing delivery system itself. Housing delivery depends on the interaction of multiple component parts, including land assembly, infrastructure provision, planning, finance, skills, supply chains, and market demand. Where these are not aligned, delays and inefficiencies are inevitable.

The proposals in this consultation may assist at the margins. Measures intended to improve transparency, reduce procedural burdens, or encourage a broader mix of outputs may prove helpful in some circumstances. However, discrete levers of this kind are unlikely, in isolation, to deliver the step-change in output that Scotland requires

without wider reforms to address barriers and fragmentation across the nation's housing system.

CIOB therefore considers that any serious effort to accelerate housing delivery must be accompanied by strategic, system-level reform. There is a need not only to consider how individual sites could be progressed more quickly, but also how the overall system for enabling and delivering housing can be made more coherent, more coordinated, and less risky for those expected to deliver homes.

Systems, not siloes

CIOB recognises that discrete policy levers such as fiscal measures, enhanced monitoring, procedural streamlining for smaller developers, and encouraging greater diversity of housing outputs may all have a role to play.

However, there is a risk that this consultation, focused on these discrete levers, rather than system-wide reform, places undue emphasis on interventions designed to influence behaviour at site level, without adequately addressing the structural conditions that shape delivery outcomes.

In practice, build-out rates are affected by a wide range of issues, many of which cannot be resolved through site-level incentives or penalties alone. These include viability concerns and market absorption stalling development, a manifestation of the system's over-reliance and attendant policy fixation on market housing; delays in infrastructure provision and the complex governance of infrastructure; labour shortages; supply chain disruption; and the sequencing of consents and approvals. A system that seeks primarily to accelerate delivery through isolated interventions may improve some processes, but fail to materially address the reasons why sites are delayed in the first place

While the consultation's focus on build-out rates is understandable, it risks overstating the extent to which site-level behaviour is the primary constraint on housing delivery. In particular, viability, or challenges of viability, are reflective of systemic issues resulting from the significant reliance on market-led housing. In a market-led system, viability is shaped by land values, financing, and profitability, all of which are influenced by wider market and economic conditions as well as a range of policy choices. As such, there are limits to the extent to which site-level incentives, such as those proposed in this consultation, can address these viability challenges, since land has already been acquired and development is underway.

Similarly, land values and land market dynamics play a critical role in shaping whether sites are brought forward and how quickly they are developed. As highlighted by the UK

Collaborative Centre for Housing Evidence in their recent report,¹ there are long-standing and well-recognised challenges with the “institutional arrangements that privilege private value extraction over public value and place quality,” which have constrained housing delivery. Policy interventions aiming to address the wider challenges of land value, therefore, may have a far greater impact on increasing the supply of housing, particularly affordable housing, than the levers considered within this consultation, which intervene much later and once land has already been acquired. Where policy interventions occur too late in the process, when land has been purchased, and development is underway, there is a risk that they increase costs without materially improving delivery or accelerating build-out rates.

Additionally, as the Letwin Review² concluded in its examination of build-out rates in fully permitted new homes, challenges relating to market absorption, and in particular issues with “the homogeneity of the types and tenures of homes on offer,” which limit the rate the market will absorb these products, are “the fundamental drivers of the slow rate of build out.” While this analysis focused on the largest sites in areas of high demand, it nonetheless underscores the limitations of later-stage interventions in improving build-out rates.

Taken together, these wider, systemic challenges reinforce the view that, while discrete measures aimed at improving build-out rates may assist in some circumstances, they are unlikely to deliver a step-change in housing output in isolation. A more effective approach would consider how land, infrastructure, finance, planning and delivery capacity can be better aligned across the system as a whole.

There is also a risk that an over-reliance on piecemeal intervention creates further complexity. Additional reporting, monitoring, or penalty mechanisms may be manageable in some cases, but they may also impose further burdens on planning authorities, developers, and other delivery partners without producing commensurate gains in output. As such, CIOB urges Scottish Government to consider the resource implications of any measures taken forward as a result of this consultation.

Beyond discrete interventions: international cases for joined-up policy approaches

Experience from other jurisdictions demonstrates the limitations of fragmented policy responses to housing delivery challenges.

Canada provides a useful example of the limitations of discrete policy interventions, rather than coordinated, system-wide reform. Over the past decade, the federal government committed more than \$115 billion CAD through its National Housing Strategy (NHS), comprised of over 10 wide-ranging programmes and initiatives.³

¹ Gibb, K., Earley, A., James, G., Watson, A.R., 2026. [More Homes Scotland: Debating a New Housing Agency](#). UK Collaborative Centre for Housing Evidence: Glasgow, pg. 8.

² Letwin, O., 2018. [Independent review of build out: final report](#). London: HM Government, p. 6.

³ Government of Canada, 2026. [‘Canada’s National Housing Strategy.’](#)

Despite a significant increase in resources and the introduction of multiple supply, affordability, and innovation programmes and incentives, the NHS failed to meet its supply targets, and evaluations concluded more than 95 per cent of homes delivered through its largest programmes were unaffordable to households in the greatest housing need.⁴ Further, the Federal Lands Initiative, which aimed to unlock surplus public land for housing development, had little impact, and evaluations found 40 per cent of supported projects were not located in areas where housing need was greatest.⁵

Despite well-intentioned policies and significant increases in financial resource, the Canadian experience suggests that, while individual programmes, incentives, and tax levers may each have merit, they are unlikely to transform delivery outcomes unless they are joined up through a coherent strategic framework. Where land, finance, infrastructure, planning and delivery capacity are not aligned, the impact of otherwise sensible policy measures is diminished.

Positively, the Canadian federal government has recently established Build Canada Homes,⁶ a national agency designed to better coordinate several components of housing delivery that previously sat in separate siloes. The agency aims to combine access to public lands and flexible financial initiatives, while upscaling modern methods of construction and facilitating large portfolio housing projects. The intention, especially for construction innovation, is to reduce risk, increase productivity and make it easier to build affordable homes at scale. These ambitions, if meaningfully connected to existing programmes, such as the Housing Accelerator Fund, which strives to tackle planning and zoning challenges and reduce red tape, could fundamentally reform the policy ‘culture’ surrounding housing development and systematically remove barriers to rapidly increasing housing supply nationally.

Similarly, in Ireland, several previous attempts to remedy housing supply challenges with discrete policy interventions have fallen short. For example, the Irish Government launched the Local Infrastructure Housing Activation Fund, which aimed to “address significant public infrastructure deficits” where they have been “hindering the early development of housing.”⁷ However, reporting from the Comptroller and Auditor General highlighted challenges and limitations with the initiative, finding that expenditures for the programme were “significantly below” annual estimates and that six of the approved projects, representing 4,000 of the 20,000 planned new homes, were not proceeding.⁸ Underscoring the importance of a joined-up policy approach, the

⁴ Beer, C., McManus, T., Rand, A., Kundra, S., Leon, S., 2022b. [Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Programs](#). Ottawa: National Housing Council Working Group, p. 28.

⁵ Office of the Auditor General of Canada, 2025. [Current and Future Use of Federal Office Space, Reports of the Auditor General of Canada to the Parliament of Canada No. Report 3](#). Ottawa: Office of the Auditor General of Canada, p. 19.

⁶ Government of Canada, 2026. [‘Build Canada Homes’](#)

⁷ Government of Ireland, 2017. [‘Local Infrastructure Housing Activation Fund \(LIHAF\) Announced.’](#)

⁸ Comptroller and Auditor General, 2024. [Report on the Accounts of the Public Services 2023](#). Dublin: Office of the Comptroller and Auditor General, p.199.

Department cited, in part, delays within the planning system, outwith its purview, as a barrier to the programme reaching its targets.

Much like the Canadian example, recent developments from the Irish Government explicitly indicate its repositioning to a “whole of government” approach to housing.⁹ The nation is now considering a wide range of levers across the housing system to improve supply, including “activating land, providing infrastructure, securing investment, improving construction viability, boosting skills, and tackling vacancy and dereliction.”¹⁰

These international cases underscore the need for a ‘whole of government’ approach to housing and a coherent, coordinated approach to interventions aiming to increase supply.

Developing a coordinated delivery model

CIOB considers that Scotland would benefit from a more integrated approach to housing delivery. Rather than relying primarily on siloed measures and programmes aimed at influencing specific points in the development process, there is an opportunity to move towards a coordinated delivery model in which key enablers of housing development are brought together more systematically.

In practical terms, this could mean aligning land assembly, infrastructure funding, planning expectations, financing mechanisms, incentives and penalties, where appropriate, and support for delivery methods within a more coherent framework. Such an approach would not remove all barriers to development, but it could significantly reduce the cumulative friction and uncertainty that currently characterise the system.

Such a model could be particularly important for non-market providers, registered social landlords, and smaller delivery partners. These organisations are not necessarily restricted by viability concerns and absorption rates in the way market providers are, and are well placed to contribute to affordable housing delivery, but often face disproportionate challenges in navigating fragmented systems of support, finance, and approval. A more coordinated approach could improve access, reduce delivery risk, and help create a stronger pipeline of viable development opportunities.

More Homes Scotland

The consultation notes the Scottish Government’s intention to establish a new national housing agency with a focus on simplicity, scale, and speed. CIOB strongly supports this approach and considers that these proposals for More Homes Scotland present a significant opportunity.

⁹ Government of Ireland, 2025. ‘[Enabling more housing.](#)’

¹⁰ *ibid.*

If designed well, More Homes Scotland could play an important strategic role in addressing the fragmentation that continues to constrain housing delivery. Rather than functioning solely as another part of the existing system, it could help provide the national, strategic oversight, coordination, and delivery support that is currently lacking.

That said, as we have seen from the experience of Homes England, there is a need to consider close working partnerships with lower-tier government administrations to ensure consistency of direction, aims, and optimal delivery outcomes. Closer alignment with regional and local authority priorities and needs would enable a national housing agency to provide strategic intervention, bespoke support, and tailored development packages rather than taking the oft-trod 'one-size-fits-all' approach.

Its role could include, for example, helping to align public investment, infrastructure planning, land assembly and delivery models; supporting more structured engagement with modern methods of construction; and enabling more coherent development pathways for organisations bringing forward housing. Consideration could also be given to how More Homes Scotland might support more coordinated procurement approaches, or targeted capital investment that helps to scale and de-risk delivery capacity in priority areas.

This is not a suggestion that More Homes Scotland alone can resolve all barriers to housing delivery. However, this agency could provide a much-needed vehicle through which wider system-level reforms can be advanced in a more practical and strategic manner than is currently possible through isolated interventions alone.

Balancing discrete policy levers with wider, systemic reform

CIOB recognises the need for practical action in the short term and understands why the Scottish Government is exploring measures that could improve build-out rates more quickly. Some of the levers proposed in this consultation may contribute positively and should not be discounted. However, it is important that these measures are not treated as substitutes for wider system reform. If Scotland is to improve delivery at pace and scale, it must address not only the symptoms of delay but the underlying structure of and current challenges with the delivery system itself.

A balanced approach is therefore required. Targeted interventions may help improve aspects of the existing system, but they should sit within a broader strategy that strengthens coordination, reduces risk, improves sequencing, and creates a clearer and more workable route from policy ambition to homes on the ground.

Conclusion

CIOB welcomes the Scottish Government's focus on accelerating housing delivery and recognises the importance of examining what further measures may support the increase of build-out rates across the country. We also acknowledge that some of the levers proposed in this consultation may have a role to play in achieving this objective. However, in our view, they do not sufficiently address the wider structural constraints that continue to shape housing delivery outcomes across Scotland in order to meet the Scottish Government's necessarily ambitious new housing targets.

The core challenge is not simply that individual sites are progressing too slowly. It is that the wider delivery system remains fragmented, operating separately rather than in coordination, with too many of the key elements required for development contingent on the vagaries of viability and absorption. Without addressing these systemic issues, there is a risk that discrete 'carrot and stick' interventions will deliver only limited outcomes.

CIOB therefore encourages Scottish Government to view this consultation within the context of a wider programme of system reform. The development of More Homes Scotland presents an important opportunity to provide greater strategic oversight and to support a more coordinated approach to housing delivery. We would welcome continued engagement as this work progresses.