Rialtas na hÉireann
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Analytical Note

Review of Strategic Housing Developments

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Executive Summary

Operational between 2017 and 2022, Strategic Housing Developments (SHDs) are a type of planning application made directly to An Bord Pleanála for high density developments of 100 or more residential units or 200 or more student accommodation units. SHDs were introduced with the aim of incentivising housing providers to activate projects of scale and accelerate increased housing supply. This note uses point in time data collected from SHD planning applications and commencement notices (as of July 2022) to summarise the characteristics of SHD applications. A regression analysis is then employed to evaluate factors affecting commencement rates.

Key Findings

- **There were 401 decided SHD applications recorded at time of data collection. 24% of these were refused permission and 76% were granted permission with conditions.**
- The three most common reasons for refusal related to design and amenities (37.6%), infrastructure (15.5%) and environmental or biodiversity impacts (14.9%).
- Commencements are recorded as of June 2022. Of the 300 SHD applications which were granted permission up to this date, 116 applications (38.7%) had commenced, accounting for 31,055 units, 184 applications (61.3%) had not commenced, accounting for 56,641 units.
- The SHD process has been significantly faster compared to processing time for large scale developments prior to 2017 in cases where a Judicial Review (JR) did not occur.
- **23.4% of SHD's had been subject to JR and even in these cases, on average the SHD process was still faster than the traditional two-tiered Local Authority process for large scale developments by between 10 (median times) and 19 (mean times) weeks.**
- The vast majority (95%) of JR's occurred following the granting of an SHD planning permission**, with the analysis finding a positive relationship between the number of observations submitted regarding an SHD application and the occurrence of JR. This suggests that applications that received more public attention in the form of observations were more likely to be subject to JR, indicating that the JR process could have been acting in part as a pseudo-appeal mechanism.** In this sense, re-introducing the appeals mechanisms for Large Scale Residential Development planning applications following the expiration of the SHD process can be considered a positive development which may reduce the prevalence of JR's into the future, alongside the new Planning and Development Bill published in December 2023.
- Although headline indicators of residential dwelling supply increased during the operational period of SHDs, no counterfactual impact evaluation has been conducted to assess how much of this increase can be attributed to the SHD process.

- **The commencement rate across all granted SHD applications as of June 2022 was 39%, or 31,055 units, with 56,641 units uncommenced (61%). While the analysis indicates that Judicial Reviews had a substantial negative effect on commencement rates, even for SHD's that were not subject to JR the commencement rate was 50%.** Large residential developments also require time to begin construction after obtaining permission. When considering only SHD's which had at least one year to commence post planning (and not subject to JR), the commencement rate increases slightly to 58.8%.
- **The average time between permission being granted and commencement was 43.3 weeks, with a median time of 35 weeks.**
- The analysis has identified several other elements which impacted commencement rates:
    - **Greater numbers of apartment units and greater net density reduced the probability of SHD commencement.**
    - The likelihood of commencement increases as more time passes beyond the date of receiving planning permission. This result likely reflects a natural lag between when permission is granted and commencement that is associated with necessary pre-commencement preparations. However, this effect was found to diminish beyond a certain point which could reflect several factors such as emerging viability constraints, changes to applicant intentions, financing etc.
    - **SHDs located in the Greater Dublin Area, Cork City and Galway City have been more likely to commence compared to SHDs located elsewhere.**
    - Applications granted permission in 2021 and 2022 had a lower probability of commencement compared to earlier years. While determining causal factors is outside the scope of this analysis, this result may reflect applications in 2021/2022 having less time to commence as well as shifts in the market that have occurred in these years such as supply chain disruption, rising construction costs and interest rate changes.
- Notably, several factors were found in the analysis to have no effect (positive or negative) on the probability of commencement. These include the number of conditions imposed on a granted planning permission, decision time, the number of student accommodation units and number of housing units in an application.

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Introduction

This note is a continuation of research carried out by Reidy and Breen (2022) which explored trends in Local Authority planning applications between 2012 and 2021 and discussed their potential significance for existing housing supply indicators with a particular focus on the growth in un-commenced planning permissions since 2018. Utilising data gathered from Strategic Housing Development (SHD) case details listed on the An Bord Pleanála (ABP) website, this note summarises the activity that has occurred through the Strategic Housing Development process from September 2017 to August 2022. By linking data gathered on Strategic Housing Development applications to Commencement Notices reported by the Building Control Management System (BCSM), we then use a probit model to examine the extent to which application specific characteristics impact the probability of SHD permissions commencing construction.

Relatively little empirical work has been carried out examining the relationship between regulatory conditions and the supply of residential dwellings in Ireland. This is despite the planning process often being cited as a barrier to the delivery of adequate housing supply due to factors such as lengthy processing times. Though a phasing out of the Strategic Housing Development process was initiated in early 2022 and a new Large Scale Residential Development process has been introduced, analysis of SHD applications can allow for greater insight into the housing supply pipeline as well as inform policy responses aimed at improving efficiency in the planning process and addressing housing supply constraints. Beyond providing an empirical description of the operation of Strategic Housing Developments, this note considers the extent to which regulatory factors and development characteristics such as decision time, location, density, and unit type impact commencement rates for large developments. Section 1 discusses the policy background. Section 2 covers data collection and summary statistics. Section 3 examines reasons for the refusal of SHD applications. Section 4 utilises a probit model to analyse SHD commencements. The concluding section discusses findings and lessons for future planning and housing policy as well as avenues for future research.

Finally, it is important to note that findings presented in this note are based on a point in time exercise. These findings therefore do not reflect the most up to date information that was available on planning and construction activity at time of publication. Nonetheless, it is intended for the analysis presented in this note to act as a methodological example, which can be further refined and built upon, of how detailed data on planning permissions and the development cycle can facilitate greater understanding of the flow and determinants of housing supply, as well as the activity and performance of planning and housing policy more generally.

1. Policy Background

First announced through the *Rebuilding Ireland Action Plan for Housing and Homelessness* (2016) in the context of a worsening housing supply shortage, the aim of a fast tracked planning application process was to "incentivise housing providers to activate projects of scale and bring an earlier provision of increased housing supply […] by introducing, for a limited four-year period, a process whereby larger housing applications, which typically tend to be appealed to An Bord Pleanála after local authority consideration, can be made directly to the Board" (Rebuilding Ireland, 2016). Operational since 2017, Strategic Housing Developments (SHDs) are a type of planning application made directly to An Bord Pleanála (ABP) for developments of 100 or more residential units or 200 or more student accommodation units. SHDs were introduced with the objective of expediting housing delivery via reduced planning permission processing time and facilitating greater levels of delivery. The rationale for a fast-tracked planning process, as outlined in *Rebuilding Ireland*, was the potential effects shorter timeframes could have on "enhancing certainty and cutting the time between acquiring a site and building on it, thereby reducing financing cost and ultimately sale prices" (Rebuilding Ireland, 2016). Reduced planning time under the SHD process was primarily achieved in two ways:

1) **The removal of planning appeals.** ABP act as a third-party appeals board facilitating the right of relevant parties[1] to appeal Local Authority planning decisions. SHD applications are made directly to ABP and as such cannot be appealed, though Judicial Reviews (i.e., legal challenges) are still possible.
2) **A comprehensive pre-application consultation process** whereby applicants provide extensive detail of proposed developments through a consultation with ABP as well as relevant planning authorities and infrastructure service providers prior to submitting a planning application.

Once introduced the legislation[2] allowed SHDs to be extended until the end of 2021. However, it was required that a review of the operation be completed by October 2019. A report by the Review Group for the Operation of the SHD process was subsequently published in September 2019. The Review Group found that the SHD process had succeeded in achieving significantly faster planning decisions up to the end of June 2019 and recommended the extension of the SHD process. The report did not investigate the potential additional supply these faster timelines may have facilitated.

[1] Appeals can arise from those who originally applied to the planning authority, those who made written submissions or observations to the planning authority about a proposed development, those who have an interest in land adjoining the application site, or from a body or organisation established with the aims of promoting environmental protection.

[2] Planning and Development (Housing) and Residential Tenancies Act 2017 and S.I. No. 271/2017 – Planning and Development (Strategic Housing Developments) Regulations 2017.

However, the report did note that activation rates had been "less than might reasonably be expected, having regard to (a) the benefits of time savings and increased certainty for developers; and (b) the resources invested by the State in operating the SHD process" and recommended SHD commencement notices be closely monitored going forward. Since then, the SHD process has faced significant challenges, in particular, criticisms have focussed on the continued low activation rates observed to date, *de-democratisation* concerns arising from reduced LA involvement and the removal of planning appeals (Lennon & Waldron, 2019), and the large number of Judicial Review (JR) challenges being brought against An Bord Pleanála over SHD decisions.

1.1 SHD's and Recent Policy Developments

The Programme for Government committed to not extending the Strategic Housing Development process beyond its legislative expiry date of February 25th 2022. Action 12.3 of Housing for All also committed to the introduction of a new planning process to replace the SHD process. In December 2021, the two-stage planning process was restored, with the new decision making process, Large-scale Residential Developments, with applications returning to the Local Planning Authority in the first instance, with the subsequent right of appeal to An Bord Pleanála (ABP). One of the rationales for returning to the traditional two-tiered planning process for scaled residential developments was to potentially reduce the occurrence of JR's through the reintroduction of appeals.

The definition of Large-scale Residential Development (LSRD) is largely similar to Strategic Housing Development (SHD), i.e., developments of 100 housing units or more, or student accommodation developments comprising 200 bed spaces or more, or a combination of same. The two main changes under the new LSRD arrangements allow for: up to 30% of the gross floor space of the proposed development to be for other uses, instead of the 15% cap under the SHD arrangements and mixed developments combining housing and student accommodation to be classified as an LSRD where the threshold is met for either element.

The new LSRD arrangements involve a pre-application consultation stage, a planning application stage, and an appeal stage. The pre-consultation stage comprises of a pre-application consultation meeting that is held within 4 weeks of a planning authority receiving a request from a prospective applicant. Following this there is then an 8 week period during which an additional LSRD meeting takes place and an LSRD opinion is issued to the prospective applicant which is valid for a period of 6 months. Where an opinion is issued indicating a reasonable basis for submitting an application, an applicant may proceed with a formal planning application. Upon receipt of a planning application, LA planning authorities are required to make a decision within 8 weeks of receipt, except in cases where requests for further information are required. Further information requests are limited to technical and environmental details unforeseen in earlier stages of the process and the extensive pre-application consultation stage is designed to minimise the need for further information requests. LSRD decisions

made the LA planning authority can subsequently be appealed to An Bord Pleanála, and the appeal must be decided by ABP within 16 weeks.

2. Data Collection and Summary Statistics

The majority of SHD application specific data utilised for this analysis was collected from SHD case listings recorded on An Bord Pleanála's website throughout July and August of 2022.[3] Data on Judicial Reviews was partially collected from case listing on An Bord Pleanála's website, which recorded Judicial Reviews that had concluded. Data for ongoing Judicial Reviews was obtained from an SHD tracker maintained by the Dublin-based law firm FP Logue.[4] Finally, commencement data was obtained from the Building Control Management System (BCMS) database of commencement notices.[5] This data was linked to SHD applications based on a combination of planning application ID numbers, addresses, and development descriptions.

2.1 Overview of Applications and Outcomes

The data collected recorded 534 SHD applications submitted to An Bord Pleanála between September 2017 and August 2022, which are here categorised into 3 application types. *Other* applications (N=39) are ones in which no decision was ever made (invalid and withdrawn) and the small number of applications that resulted in a split decision.[6] *To be decided* applications (N=94) are ones that had been lodged with ABP, but a decision had yet to be reached at time of data collection (July and August 2022). Finally, *decided* applications (N=401) are ones in which a decision was made by ABP to either grant permission (with conditions) or refuse permission.

Table 1 – Overview of SHD Applications, Sep 2017 – Aug 2022

Application Category	Application Outcome	Number	Percentage
Decided	Conditional Permission	305	57.1%
Decided	Refused Permission	96	18.0%
To be decided	Lodged Application	94	17.6%
Other	Split Decision	4	0.7%
Other	Invalid Application	23	4.3%
Other	Withdrawn Application	12	2.2%
Total		**534**	**100.0%**

Figure 1 graphs the number of granted, refused, and lodged applications (i.e., decided and to be decided in **Table 1**) by the date of application from 2017 Q2 to 2022 Q3. The trend in applications is largely stable from 2018Q4 to 2022Q1. The increase in SHD applications in 2022Q2 may be

[3] Any errors that may have occurred during the data collection process, and, therefore, that are potentially reflected in the findings of this note, are the sole responsibility of the authors.

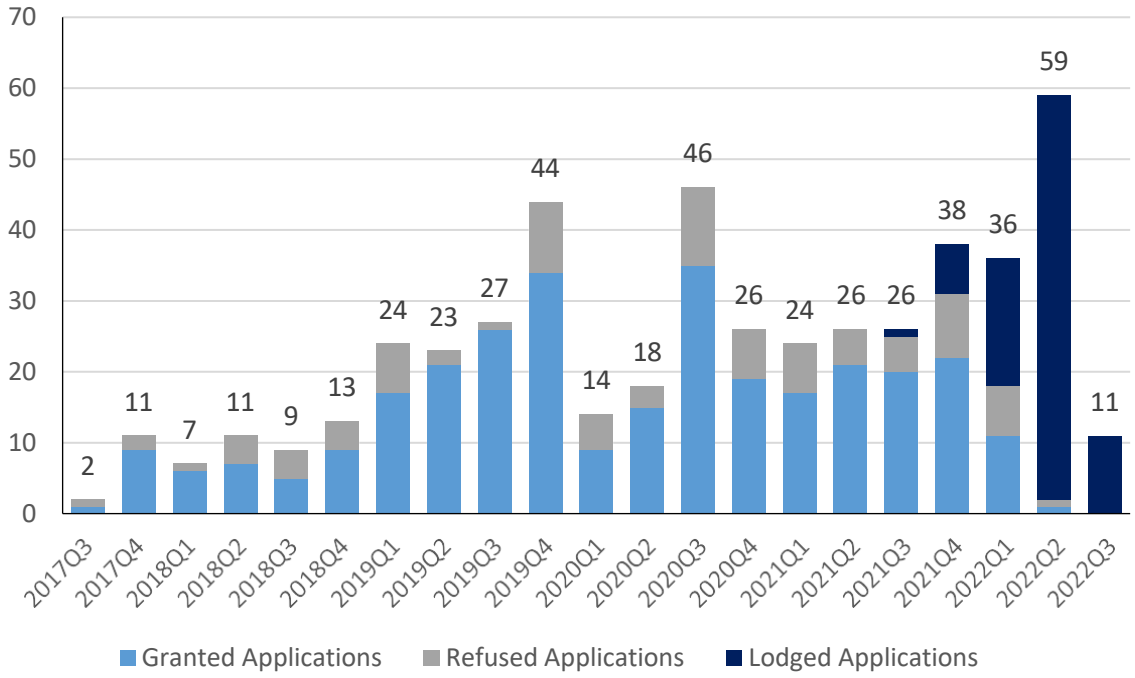
[4] https://www.fplogue.com/shd-tracker/

[5] https://nbco.localgov.ie/

[6] A split decision is one in which planning permission is granted for a portion of the development outlined in the application. For example, a planning authority might decide to grant permission for 10 houses but refuse 90 apartments also outlined in an application.

attributable to the phasing out of the SHD process in early 2022 and indicate a strong demand to obtain an SHD planning permission before the process expired.

Figure 1 – Breakdown of Decided and to be Decided Applications by date of application, 2017Q2 – 2022Q3



2.2 Scope of Analysis

Data for planning decisions and commencements was collected throughout July and August of 2022. Accordingly, the analysis presented in this note is a point in time exercise and as such, unless otherwise specified, the figures and analysis presented throughout the rest of this note will refer *only* to the 401 decided SHD applications outlined above, and excludes the 39 applications categorised as 'other', and the 94 applications categorised as 'to be decided' referred in

Table 1.

Application Category	Application Outcome	Number	Percentage
Decided	Conditional Permission	305	57.1%
Decided	Refused Permission	96	18.0%
To be decided	Lodged Application	94	17.6%
Other	Split Decision	4	0.7%
Other	Invalid Application	23	4.3%
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Total		**534**	**100.0%**

2.3 Refusal Rate

Of the 401 decided SHD applications, 76% were granted permission with conditions and 24% were refused permission (**Table 2**). Reidy and Breen (2022) found the refusal rate for Local Authority (LA) planning decisions between the 2012 and 2021 period to be 15% overall and 23.5% for multi-unit

applications (i.e., excluding single build). This suggests that LA refusal rates for multi-unit developments and SHD refusal rates are broadly similar.

Table 2 – Refusal Rate of SHD Applications

Decision	No. Applications	% Applications	Number of Units
Grant Permission	305	76%	88,775
Refuse Permission	96	24%	26,000
Total	401	100%	114,775

2.4 Repeat Applications

It is worth noting that it is possible for the same site location to be associated with multiple SHD applications. For example, after an application is declared invalid, withdrawn, refused, or after a quashed decision following Judicial Review, an applicant might alter their initial development plans before submitting a new planning application on the same site location.

In total, 40 (9.97%) of 401 applications related to a site location that had previously been subject to an SHD application that had previously been withdrawn, declared invalid, refused, or quashed through Judicial Review. SHD site re-applications have substantially lower refusal rates, with 38 (95%) of the 40 identified reapplications being granted permission by ABP.[7] This is to be expected as previously unsuccessful application on a site will specify reasons for refusal and thereby allow subsequent applications to be designed to avoid refusal for the same reasons.

2.5 Unit Type

There were four types of housing units present in SHD applications: houses, apartments, student accommodation, and shared living (i.e., co-living)[8]. Just 13 SHD applications included shared living spaces (**Table 3**), 9 of these were for developments containing only shared living units, while 4 were for applications with a mix of shared living and apartment units. 35 SHD applications included student accommodation (**Table 4**), 26 of these were for developments comprising of only student

[7] Repeat applications were identified using the *Strategic Housing Development (SHD) Applications made to An Bord Pleanála* dataset published on data.gov.ie.

[8] It is worth noting that new developments of shared living accommodation have been banned under Housing for All.

accommodation, while 9 had a mix of student accommodation, and houses or apartments. 353 SHD applications were for developments containing only houses and/or apartments (**Table 5**), comprised of 81,505 apartment units and 24,137 housing units. The average number of units within these SHD applications was 299 units and the median was 237 units.

Table 3 – Shared Living Applications

Shared Living	No. of Applications
Total Applications	13
Total Shared Living Spaces	3,172
Granted Applications	8
Refused Applications	5

Table 4 – Student Accommodation Applications

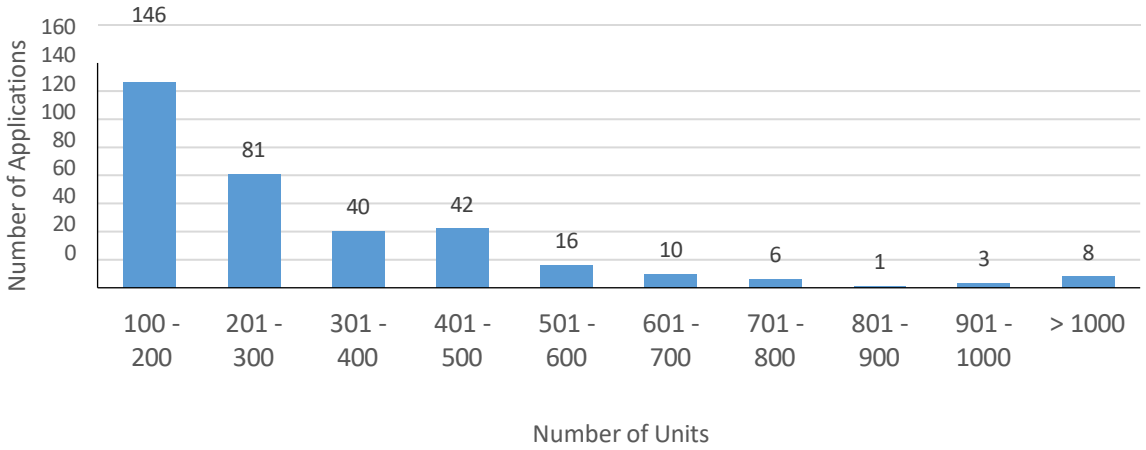
Student Accommodation	No of Applications
Total Applications	35
Total Student Bed Spaces	17,265
Granted Applications	32
Refused Applications	3

Table 5 – Housing and Apartment Applications

Houses and Apartments	No of Applications
Total Applications	353
Total Units	105,642
Granted Applications	265
Refused Applications	88

Figure 2 graphs the total number of units per application comprised of only houses and/or apartment units. Just 4 out of total of 401 applications (c.1%), contained only housing units while 166 applications (41.4%) contained some mix of apartments and houses. Apartment only developments have been the most common form of SHD application with 174 applications (43.4%).

*Figure 2 – Number of Units of Housing and Apartment Units per Application**

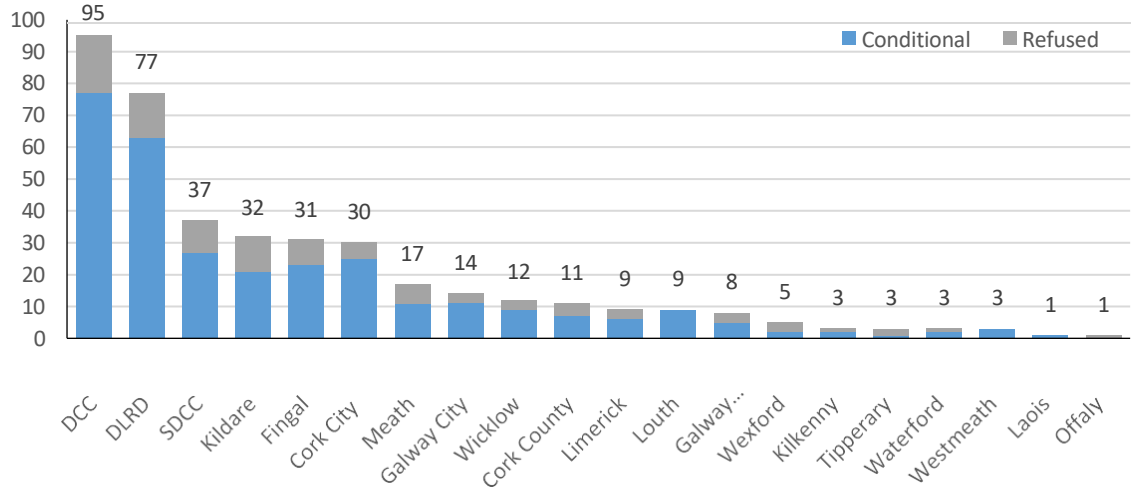


**For SHD applications without student accommodation and shared living*

2.6 Applications across Local Authorities

Figure 3 displays the number of applications per LA with a breakdown of the planning decision (i.e., refused permission or granted permission with conditions), and indicates a significant amount of geographic clustering around urban centres. Just under 60% of SHD applications associated with just over 74,000 units were located in Dublin. A further 15% of SHD applications were located in Dublin's commuter belt counties (Meath, Kildare, and Wicklow), and were associated with c.17,000 units. 26% of applications associated with over 27,500 units were located in other counties.

Figure 3 – SHD Decisions across Local Authorities



2.7 Density

Density refers to the number of residential units per hectare. Density figures were calculated for each application by dividing the total number of units by gross site area (measured in hectares). The gross density statistics presented in this section are intended to give an indication of the size of applications, and how that size varies across Local Authorities. Net area, which accounts for factors such as green spaces and roads, is considered a more appropriate metric for calculating density when evaluating individual planning applications because it is a more precise measure of the developable

area within a site. Therefore, the model of factors affecting commencement rates outlined in **Section 4** utilises net density instead of gross for this reason[9].

The average gross density of developments outlined in SHD applications was 137 units per hectare while the median was 96 units per hectare, however there is significant variation in density across SHD applications (**Figure 4**) ranging from below 25 units per hectare to above 300, which likely relates to the specific site location and density requirements[10].

[9] Net density summary statistics are available in Appendix 2.1.

[10] DHLGH issue density guidelines for planning authorities under Section 28 of the Planning Development Act, 2000 (as amended) in the form of Sustainable Residential Development in Urban Areas (Cities, Towns & Villages).

Figure 4 – Distribution of Gross Density (units per hectare) across SHD Applications.[11]

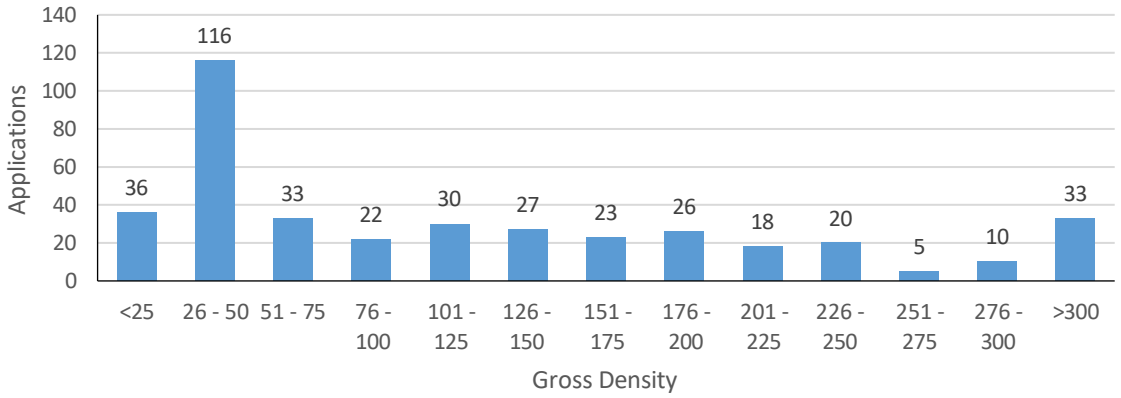


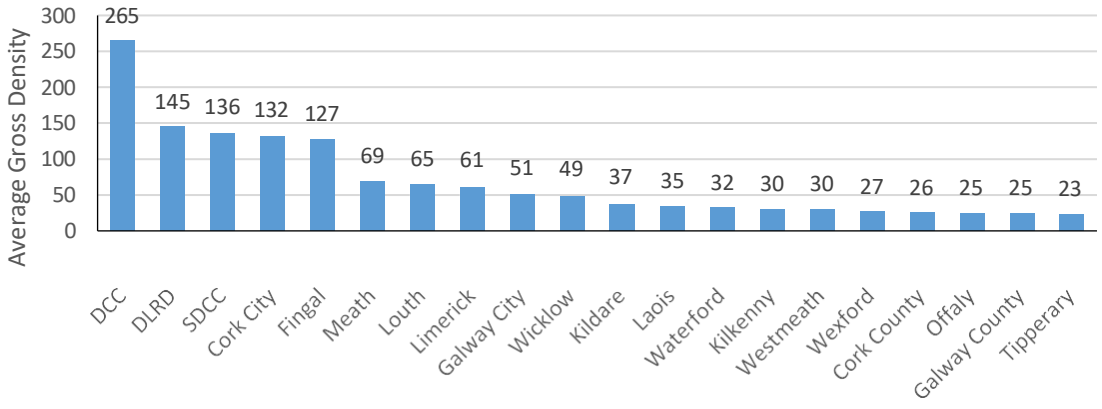
Table 6 provides an overview of the appropriate levels of density for different types of locations as set out in the 2009 density guidelines "*Sustainable Residential Development Guidelines for Planning Authorities*" that were in place during the SHD process. These density guidelines have since been amended with revised density guidelines published in January 2024.

Table 6 – 2009 Residential Development Density Guidelines

Density Recommendation (dwellings per hectare)	Development Setting
50+	Public Transport Corridors
30 – 40+	Centrally Located Sites
25 – 50	Outer Suburban and Greenfield
25 – 35	Edge of Centre Sites
10 – 25	Edge of small town or village

These density requirements likely explain some of the variation in density across SHD applications, particularly the comparatively high average density levels in the Dublin LA's (**Figure 5**).

Figure 5 – Average Gross Density of SHD Applications



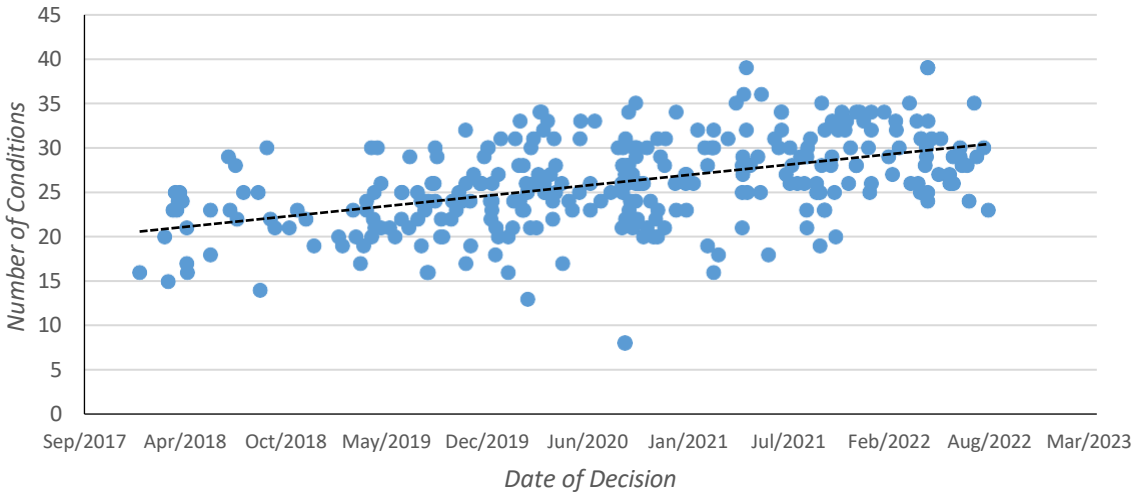
[11] Summary statistics for density based on 399 applications rather than the total of 401 in other sections. This is because for two applications in the dataset information of density was not available because the

inspector’s report, which contained a figure for gross site area, was not available.

2.8 Conditions

All SHD applications granted by ABP had conditions attached, with an average of 26 conditions per application. A notable trend in the data was an increasing number of conditions placed on each SHD application over time (**Figure 6**), with the average number of conditions per application rising from 22 in 2018 to 30 conditions in H1 2022. The increase in conditions applied over time could be a result of previous Judicial Review cases creating a precedent for new types of conditions for ABP to apply or could reflect ABP gaining more experience and knowledge of handling SHD cases.

Figure 6 – Distribution of Conditions per Application over Time



2.9 Observations

Observations refer to the number of written submissions received by ABP from third parties on each application. Observations can be submitted to ABP by any person, authority, or body up to 5 weeks after an SHD application has been received and the board must have regard to these when deciding an application. Observations can be both positive and negative in nature and can relate to comments, supporting arguments, or objections on the grounds of planning with respect to various aspects of an application such as zoning, development plans, or design.

The average number of observations per SHD application submitted to ABP was 35 (median of 16). Notably, the data shows that the volume of observations submitted to ABP regarding SHD applications does not appear to impact the decision to grant or refuse permission. The average number of observations submitted on refused applications was 31, while the average number of observations submitted on granted applications was 30[12]. While these figures may suggest the volume of observations is not a predictor of the outcome of a SHD decision, it is worth noting that data on the nature of the submitted observations was not collected or analysed for this paper (i.e., whether

[12] This is based on removal of large outliers where 3 granted applications received 600+ observations which skewed the data.

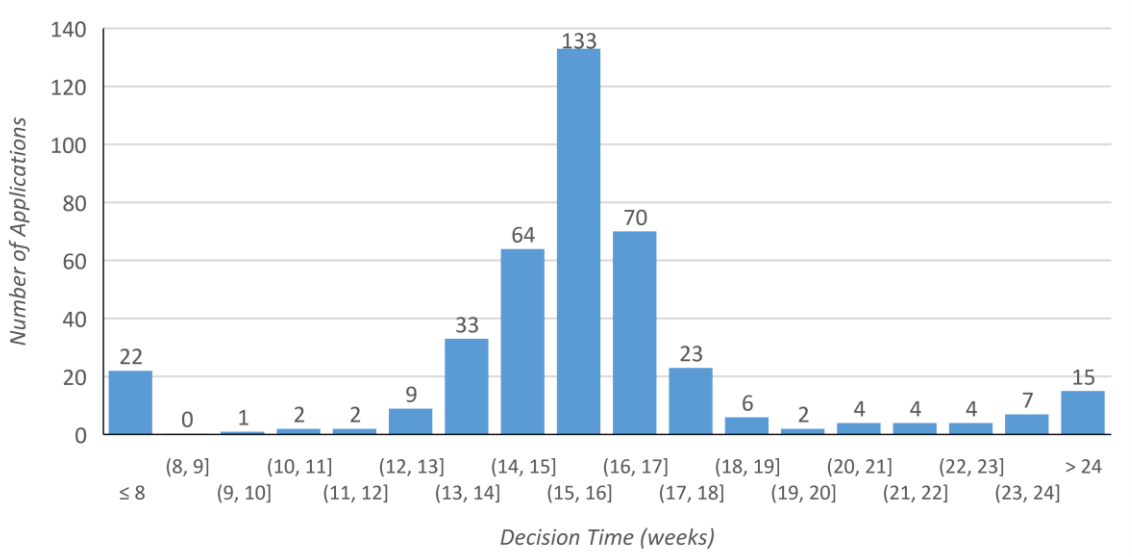
observations are supportive or critical in nature). The nature, rather than volume, of submitted observations may be more strongly correlated with the outcome of SHD decisions.

2.10 Decision Time

Decision time refers to the amount of time between when an application is lodged and when ABP makes a decision, with a statutory objective to decide SHD applications within a 16-week period after an application is lodged. This period can be extended to 24 weeks when ABP holds an oral hearing for an application.

Figure 7 displays the distribution of decision time across SHD applications. The average decision time for an SHD was 15.7 weeks (110 days), with 66% of applications (266 applications) decided in 16 weeks or less (112 days). 34% of applications were decided in excess of 16 weeks, with 3.7% or 15 applications having a decision time in excess of 24 weeks.

Figure 7 – SHD Decision Time (i.e., weeks between application and decision)



The second major element of SHD processing time, beyond the time between application and decision, is the time associated with the requisite pre-application consultation stage. Data was not collected on SHD pre-consultations so this time element of the SHD process was not examined. However, based on the timeframes outlined in legislation, the pre-consultation stage should not exceed 9 weeks.[13] Assuming a 9-week pre-application consultation timescale is accurate in practice,

[13] Upon receipt of a pre-consultation request, ABP must respond within two weeks. Consultations are then held within 4 weeks of acceptance. Within three weeks of holding a consultation meeting, ABP issue a notice to prospective applicants and relevant planning authorities outlining an opinion as to whether an SHD application should be formally lodged.

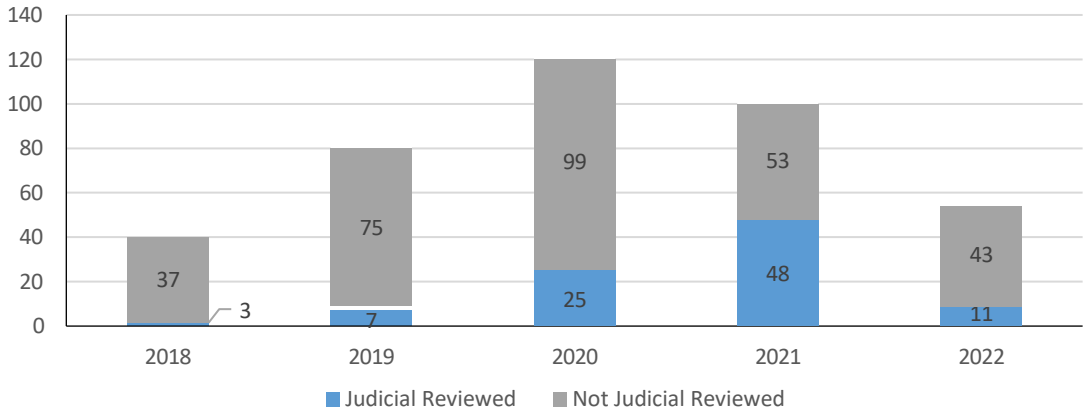
the average amount of processing time associated with obtaining planning permission through the SHD process is 25 weeks (i.e., 9 week consultation and 16 week average decision time).

2.11 Judicial Reviews

Judicial Reviews are legal challenges to the validity of decisions taken by ABP with respect to the processes and procedures followed when ABP makes a planning decision. Data for Judicial Reviews was collected from two sources for this analysis. The first being SHD case listings on ABP's website which recorded Judicial Reviews that had fully concluded of which there were 21 at time of data collection. The second data source was a SHD tracker maintained by the law firm FP Logue[14] , which captured data in relation to Judicial Reviews that were ongoing at time of data collection.

Overall, 94 out of 401 decided SHD applications (23.4%) had been subject to Judicial Review, and related to 31,476 units. All but 5 of these Judicial Reviews occurred following the granting of planning permission. The annual prevalence of SHD Judicial Reviews is outlined in **Figure 8**, with the frequency of JRs increasing each year between 2018 and 2021, with almost half of all SHD decisions being subject to a Judicial Review in 2021.

Figure 8 – Applications and Judicial Reviews per year, 2017 – 2022 (July)*



**Includes Judicial Reviews that had both concluded and were ongoing at time of data collection.*

2.12 Judicial Reviews, Observations and Traditional Planning Appeals

SHD applications are made directly to ABP and the traditional appeal mechanism for planning decisions made by LA's is not possible. Although SHD Judicial Reviews are possible, they are distinct from traditional planning appeals in that they do not challenge the merits of a decision from the perspective of proper planning and development. The formal avenue by which interested parties can have input in the SHD decision making process in this regard is via the submission of observations to ABP before a decision is made. Observations can be submitted to ABP by any person, authority, or body up to 5 weeks after an SHD application has been received and the board must have regard to

[14] Available here: https://www.fplogue.com/shd-tracker/

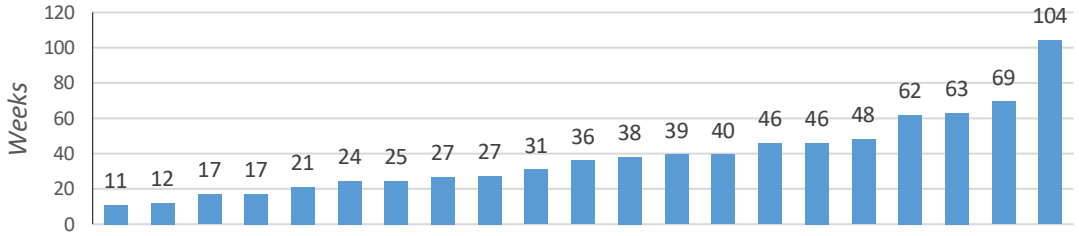
these when making decisions. However, SHD decisions are ultimately at the discretion of the board which, due to the lack of an appeal mechanism, leaves Judicial Review as the only means by which interested parties can potentially halt an SHD decision. With this in mind, a notable feature of SHD applications is the relationship between the volume of submitted observations and Judicial Reviews. SHD applications subject to Judicial Review had an average of 80 observations and median of 36 observations. While SHD applications not subject to Judicial Review had an average of 22 observations and a median of 12. The positive relationship between the volume of observations and prevalence of Judicial Reviews suggests that Judicial Reviews could be acting in part as a pseudo appeal mechanism.

Although the Judicial Review process for SHD decisions and the traditional LA appeal mechanism are distinct processes, comparing the frequency and timing associated with both is useful in understanding the impact of different regulatory environments on the delivery of residential development. Reidy and Breen (2022) found that 12.6% of multi-unit applications made to Local Authorities are appealed, which is approximately half the prevalence of Judicial Reviews among SHD decisions.

2.13 Judicial Review Timing

With respect to timing, Judicial Reviews can be initiated up to eight weeks after a decision has been made by ABP. Data on the time associated with SHD Judicial Reviews was available from the 21 concluded SHD decisions recorded on ABP's website at time of data collection. This data indicates that the average time between planning decision and Judicial Review outcome was 38.3 weeks. However, there was significant variation around this average ranging from a minimum of 11 weeks to a maximum 104 weeks (**Figure 9**).

Figure 9 – Time between SHD Decision and Judicial Review Outcome (weeks)



2.14 SHD vs LA Decision Times

DHLGH carried out an assessment of decision time on major housing applications prior to the introduction of SHDs in 2016. The assessment found an average time of 82 weeks and a median time of 70 weeks for developments of 100+ housing units to go from pre-application consultation to post-appeal (an average comprised of 33.7 weeks for pre consultation, 29 weeks for decision, and 19.1 weeks for appeal). However, these figures were based on a small sample of just 15 applications. Reidy

and Breen (2022) found the average decision time for multi-unit applications (i.e., 2+ units) processed by planning authorities between 2012 and 2021 to be 18.2 weeks, and an overall appeal time (for all application types) to be 20.1 weeks, although Breen and Reidy (2022) do not include timelines for pre-application consultation processes.[15]

As outlined in **Table 7**, comparing against these two sources, the SHD decision time has been faster than LA planning authority decision time, with average SHD decision times below both LA decision time estimates and significantly faster for SHD's that have not been subject to a JR.

Both DHLGH (2016) and Breen and Reidy (2022) report similar appeal times at 19 and 20 weeks. While appeal timing is not relevant to SHDs, Judicial Review timing is relevant given the large number of legal challenges brought against ABP over SHDs to date. As outlined above, the available data indicates the average time associated with a SHD Judicial Reviews was 38.3 weeks. Combining the pre-consultation, decision, and judicial review timelines for SHDs indicates a total average potential processing time of 63 weeks and a median of 60 weeks, which is significantly less than the average timelines of 82 weeks (median of 70 weeks) under the LA process for large scale developments (+100 units).

However, given that a significant number of Judicial Reviews were yet to conclude within the available data, the timelines reported here could be subject to change depending on the length of time associated with further SHD Judicial Reviews. Ongoing monitoring of SHD timelines is therefore required for a definitive assessment of SHD processing time.

Table 7 – Comparison of Available Data on Mean and Median Planning Timeframes (weeks)

	SHD Applications	**Local Authority Applications**	
Application Type	100 units+	100 units+	2 units+
Mean Pre-Consultation Time	9	33.7	N/A
Mean Decision Time	15.7	29	18.2
Total Excluding Appeal/Judicial Review	24.7	62.7	18.2
Mean Appeal Time	N/A	19.1	20.1
Mean Judicial Review	38.3	N/A	N/A
Total Mean Processing Time	**63**	**81.7**	**38.3**
Total Median Processing Time	**60**	**69.8**	**27**

[15] The prevalence of appeals amongst planning applications is much higher in the DHLGH data when compared to data reported by Reidy and Breen (100% and 12.6% respectively). All 15 developments contained in the DHLGH data had been appealed. A lack of complete national planning statistics means it is unclear if this very high rate of appeal in the DHLGH statistics was typical of large-scale residential developments prior to the introduction of SHDs, or if these 15 developments were specifically selected for the DHLGH assessment because an appeal had occurred.

Source	ABP Case Listings	DHLGH (2016)	Reidy and Breen (2022)

3. Reasons for Refusal

96 out of 401 SHD applications (24%) were refused planning permission. Several reasons are provided with each decision to refuse planning permission which are categorised and summarised in **Table 8**. Specific examples of refusal reasons listed under each category are outlined in **Appendix 1**. The three most common reasons for refusal related to design and amenities (37.6%), infrastructure (15.5%) and environmental or biodiversity impacts (14.9%).

Table 8 – Reasons for SHD Refusal

Category	Description	Frequency	%
Design & Amenities	Lack or poor quality of amenities. Design is functionally or aesthetically insufficient.	*68*	*37.6%*
Infrastructure & Servicing	Infrastructure needed for development is lacking or insufficient.	*28*	*15.5%*
Environmental & Biodiversity	Adverse environmental/biodiversity consequences or insufficient environmental assessment provided.	*27*	*14.9%*
Flood risk	Potential flood risk or insufficient flood risk assessment provided.	*15*	*8.3%*
Density	Too many/few units given size and location of site, and planning objectives.	*13*	*7.2%*
Unit Mix & Size	Inadequate mix of housing. Units too large or small.	*7*	*3.9%*
Zoning	Land not zoned for residential development under current development plan.	*7*	*3.9%*
Protected Structure	Development would adversely impact a protected structure.	*7*	*3.9%*
Other	Other	*9*	*5%*
Total	All Reasons	*181*	*100%*

4. SHD Commencements

Utilising data from the Building Control Management System (BCMS) database of commencement notices, data was gathered on SHD commencement rates as of June 2022[16]. SHD data was linked to the BCMS data using a combination of planning application ID numbers, site addresses, and development descriptions. In most cases several of these variables appeared in both the planning application and the BCMS database.[17]

There can be multiple commencement notices filed for a particular development which refer to various aspects of the development cycle such as site preparation or the construction of different phases of units. In many cases SHD applications had multiple commencement notices in the BCSM database. In cases where multiple commencement notices appeared for one SHD application, the earliest notice was taken as the commencement date. It is acknowledged that initial commencement notices often relate to site preparation for large scale developments. In this sense, this analysis only examines the initial stages of residential development (i.e., planning and initial commencement). It is possible that in cases where commencement occurs, developments take several years to complete, and some may never reach completion. More detailed monitoring of the SHD process, and future large scale residential developments, is needed in this regard to fully assess factors that might slow or halt large development post-planning.

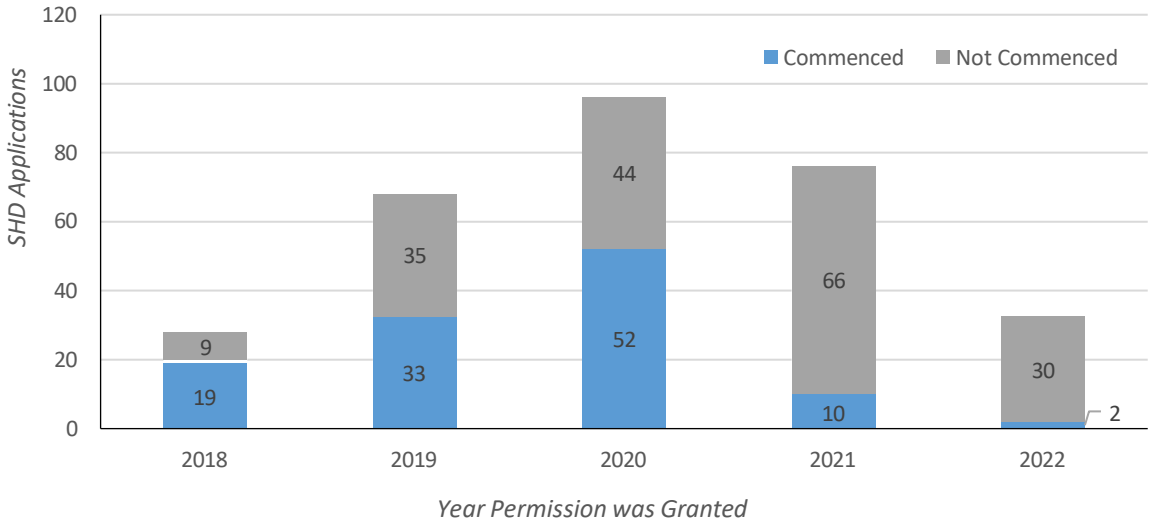
Commencements are recorded as of June 2022,[18] and of the 300 SHD applications granted permission up to this point, 116 applications (38.7%) had commenced (accounting for 31,055 units). 184 applications (61.3%) had not commenced (accounting for 56,641 units). The majority of SHD commencements occurred prior to 2021 **(Figure 10)**, which is likely due to two reasons; i) the large number of SHD Judicial Reviews that occurred in 2021 and, ii) a natural lag between when planning permission is obtained and when commencement occurs.

[16] A commencement notice is a notification to a Building Control Authority that a person intends to carry out works and an SHD application is here considered "commenced" if a corresponding commencement notice had been lodged after the date planning permission was granted.

[17] The BCMS data is administrative and self-reported in nature. Therefore, it is important to note that any potential lack of compliance with the BCMS or any recording errors present in the BCMS data could have resulted in a commenced development not being recorded for this analysis.

[18] The most up to date commencement data available at time of data collection was for June 2022. 7 SHD applications were decided beyond June 2022 at time of data collection. These 7 applications are therefore not included in the commencement data presented in this section because their commencement status was unknown.

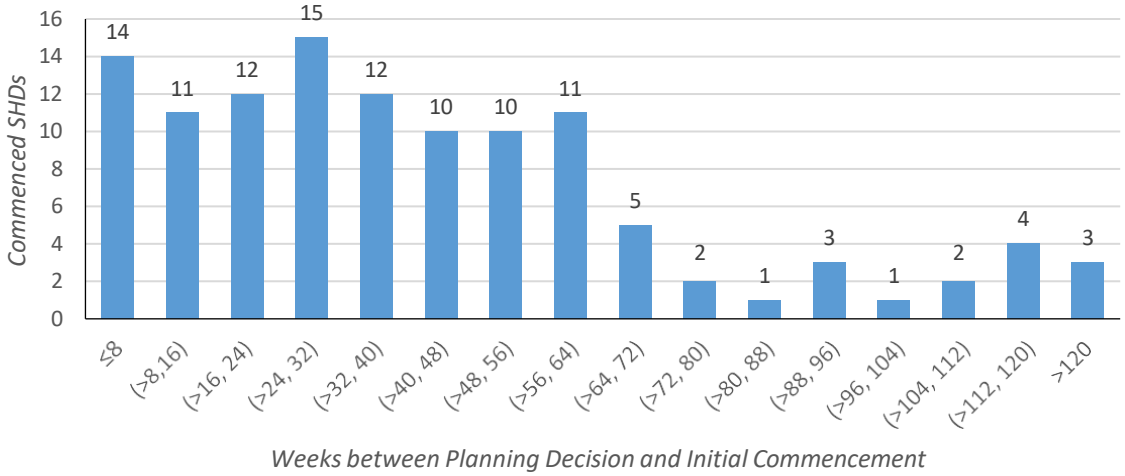
Figure 10 – Commenced and Non-Commenced SHD Planning Permissions as of June 2022 (by Date of Decision)



Of the SHD applications that commenced as of June 2022, the average amount of time between when an application was granted permission and when commencement first occurred was 43.3 weeks, with the median time being 35 weeks. However, there is a notable spread in the distribution of time between permission and commencement with some developments commencing in less than two months and others commencing in over a year (**Figure 11**). At the 25th percentile commencement time was 18 weeks and at the 75th percentile commencement time was 56 weeks. This variance could reflect a variety of factors such as Judicial Reviews, delays or changes in development financing, delays associated with COVID-19 restrictions, supply chain disruptions or differences in the scale and complexity of requisite preparatory works associated with different site locations.

The report of the Review Group for the Operation of the Strategic Housing Development process published in September 2019 noted that the available data (comprising 11 SHD applications) indicated the average time period between the granting of permission and the start of construction was 35.4 weeks. Despite this lower earlier figure, no upward trend in the time between obtaining permission and commencement is evident in the available data. The difference between the figure reported by the Review Group and the data in this note is likely due to differences in sample size.

Figure 11 – Time between Granting of SHD Planning Permission and Commencement (weeks)



4.1 Commencement Analysis: Data and Methodology

A probit model was used to examine the relationship between application specific characteristics and the probability of commencement. A probit model estimates the relationship between a dependent variable (in this case whether an SHD application commenced) and a series of independent variables (in this case SHD application characteristics) whereby the dependent variable can only take two values[19]. Probit models can be used to estimate the probability that a data point with a certain set of characteristics takes on either value of the dependent variable. In this instance, of interest is whether different characteristics of SHD applications impact the probability of commencement. The average marginal effect for variables found to be statistically significant in the model is reported below and is a measure of the average effect these variables had on the probability of commencement.

Below the variable inputs and the probit model are briefly outlined, followed by a review of the results. Full regressions results and summary statistics of the sample utilised for the model are displayed in **Appendix 2.**

When interpreting the results, it is important to note that the choice of variables was primarily informed and therefore limited by available data. Other potentially relevant factors include characteristics of site locations, access to finance, interest rates, labour capacity, site sales and broader viability issues (Mitchell McDermott, 2023). However, these factors are not considered here but could also influence the probability of planning permission activation. Future work and more detailed monitoring and data collection are necessary for further analysis of this topic.

[19] Here the dependent variable is equal to one if an SHD application that was granted permission commenced as of June 2022 and equal to zero otherwise.

The model employed to explain commencements can be summarised in four parts. Firstly, three regulatory variables which consist of:

1) A dummy variable equal to one if an application was Judicial Reviewed,

2) The number of conditions imposed on each planning permission,

3) The time between when an application was submitted and when a decision was made.

These three variables capture various aspects of regulatory burden and ex-ante we expect the probability of commencement could decrease with increases in these three variables.

Secondly, location is accounted for with a series of dummy variables for each Local Authority within the Greater Dublin Area[20] as well as Cork City and Galway City. The Local Authority within which an SHD site is situated could impact the probability of commencement for a variety of reasons such as property prices, household incomes, land costs, or LA development plans.

Thirdly, the impact of application specific characteristics on commencement is considered with the inclusion of net density (i.e., the total number of units divided by net site area), the number of apartment units, the number of housing units, and the number of student accommodation bed spaces.

Finally, time is accounted for in two different ways. Firstly, the model is estimated with a *time since decision* and *time since decision squared* variable. This variable simply captures the amount of time between when an application was granted permission and the end date of the commencement data used for this analysis (end June 2022). It is expected that the likelihood of commencement increases as more time passes after obtaining permission. The model includes the quadratic term to test for a concave relationship between the probability of commencement and time. As discussed above, there is likely a natural lag between the granting of permission and commencement which reflects necessary preparatory arrangements post planning such as acquiring finance, acquiring materials, or coordinating labour. Available data indicates the average amount of time between when an application was granted permission and when commencement first occurred was 43.3 weeks, while the median time was 35 weeks. After enough time has passed, it is hypothesised that the probability of commencement starts to diminish over time due to factors relating to changes in applicant intention, or changes in development finance which could effectively render the original permission obsolete from the perspective of commencement.

Separately, a model with a series of dummy variables reflecting the year in which an application was granted permission was estimated with 2018 being the base year. Importantly, applications in the dataset are not contemporaneous. All else equal, an application which is granted permission in 2018 could have an entirely different probability of commencement when compared to an application

[20] Dublin City Council, South Dublin City Council, Dun Laoghaire-Rathdown, Fingal, Kildare, Wicklow, Meath.

granted permission in 2022. Changes in market, regulatory and policy conditions such as input costs, property prices, LA development plans, or certain programmes introduced through Housing for All could impact that probability of commencement in any given year. Consequently, these year dummy variables are somewhat difficult to interpret as they will also capture the *time since decision* dynamic outlined above, as well as a variety of other year specific factors which we are unable to specify.

There is, unsurprisingly, a high degree of multicollinearity between the *time since decision* variable and the year dummy variables. Hence, the model is estimated twice. Firstly, it is estimated with the *time since decision variable* and secondly with year dummy variables. A check for multicollinearity was carried out amongst all variables in the model through inspection of the variance inflation factor and no other variables were deemed necessary to separate out or remove due to collinearity.

4.2 Commencement Analysis: Results

Of the two models estimated, the model containing year dummy variables performs marginally better at fitting the data. Thus, the average marginal effects reported in this section, apart from results for the *time since decision* variables, are based on the model containing year dummy variables (Model 2 in **Appendix 2**). However, both models produced very similar results. Full regression results are outlined in **Appendix 2**.

Overall average marginal effects[21] of the variables found to be statistically significant are outlined in **Table 9** and indicate the following:

- The prevalence of Judicial Reviews amongst SHDs reduced the probability of commencement by 28.7% on average.
- A one unit increase in the number of apartment units decreased the probability of commencement by 0.03% on average, and a one unit increase in net density decreased the probability of commencement by 0.05% on average. Larger changes (such as an additional 100 units) in the number apartments or net density have larger effects on commencement probability (see **Figure 12** and **Figure 13** below).
- Being located in any of the LA's included in the model had a positive effect on the probability of commencements, indicating that developments located in the Greater Dublin Area, Cork City, and Galway City have been more likely to commence when compared to SHD sites located elsewhere (see **Figure 14** below).
- SHD applications granted permission in 2021 and 2022 have a lower probability of commencement compared to SHD sites granted in previous years, with the negative effect being smaller in 2021 compared to 2022 (-27.3% and -44.8% respectively).

[21] The effect of a change in an independent variable on the probability of commencement averaged across all data points.

- Model 1 (**Appendix 2**) included a *time since decision* variable instead of year dummy variables. Results indicate that the probability of commencement increases with time following the granting of permission. However, the effect size is concave, following an inverted-U shape. Accordingly, the positive effect of time on the probability of commencement diminishes beyond a certain time threshold. This is displayed graphically below in **Figure 15**.

Notably, several variables were not statistically significant. These included decision time (time between submitting an application and receiving planning permission), the number of conditions imposed on a granted planning permission, the number of student accommodation units and number of housing units, as well as the dummy variables for the years 2019 and 2020 (base is 2018).

Table 9 – Estimated Average Marginal Effect on Probability of Commencement (Model E in Appendix 2)

	Average Marginal Effect on the Probability of Commencement	Standard Error	p-value
Judicial Review	-28.72%	5.38%	0.000
Number of Apartments	-0.03%	0.01%	0.026
Net Density	-0.05%	0.02%	0.004
Dublin City Council	38.29%	9.24%	0.000
South Dublin City Council	32.86%	10.23%	0.001
Dun Laoghaire-Rathdown	44.21%	8.45%	0.000
Fingal	38.49%	11.37%	0.001
Kildare	49.44%	10.57%	0.000
Meath	26.56%	12.58%	0.035
Wicklow	49.65%	14.45%	0.001
Cork City	21.25%	10.60%	0.045
Galway City	24.60%	12.66%	0.052
2021	-27.29%	9.62%	0.005
2022	-44.83%	12.78%	0.000

i) Apartments and Net Density

Figure 12 and **Figure 13** display how the estimated probability of commencement changes as the number of apartments and net density increases. While the average marginal effect on the probability of commencement of a one unit increase in both these variables is small, at -0.03% for apartments and -0.05% for net density, the magnitude of the estimated effects are larger when counting across a greater number of units.

Figure 12 –Estimated Probability of Commencement by Number of Apartments

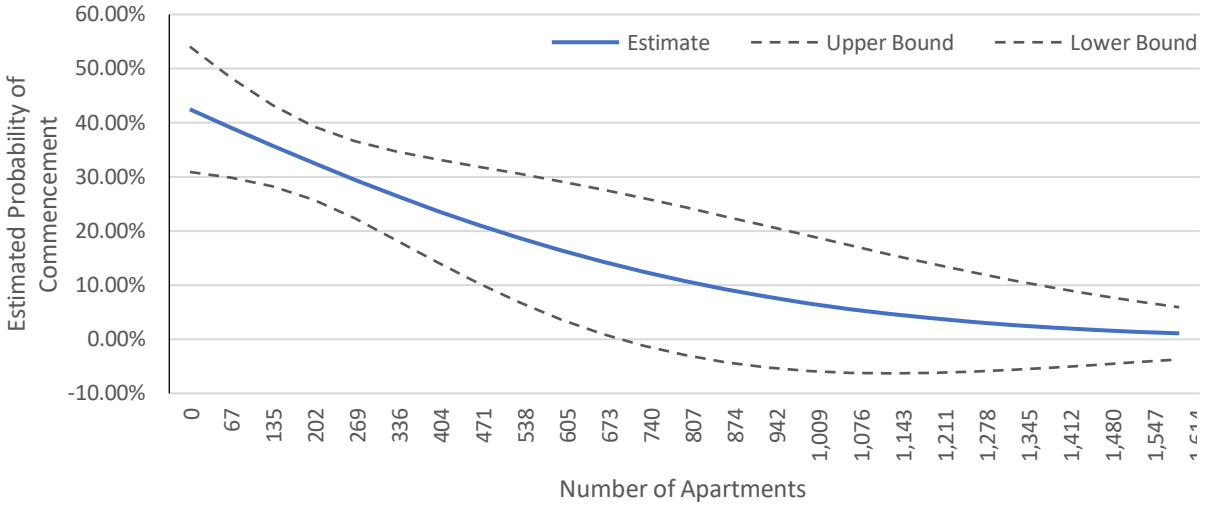
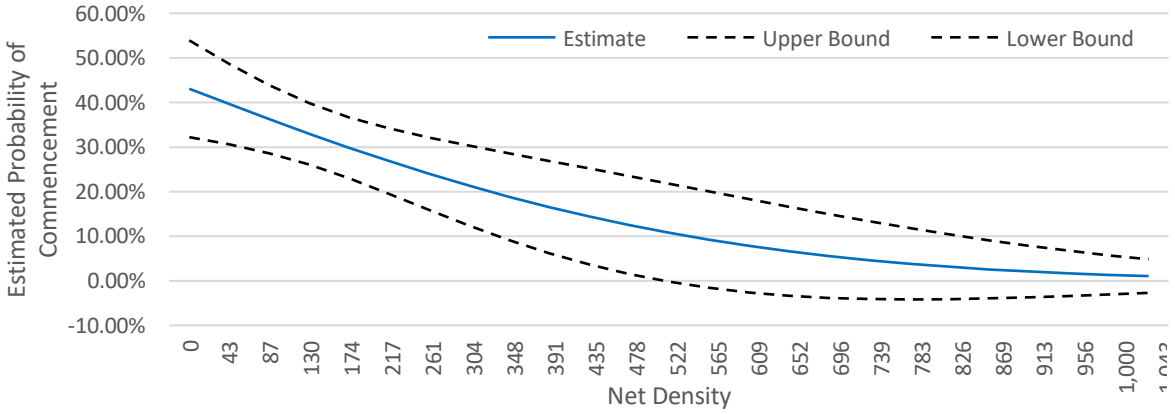


Figure 13 – Estimated Probability of Commencement by Net Density



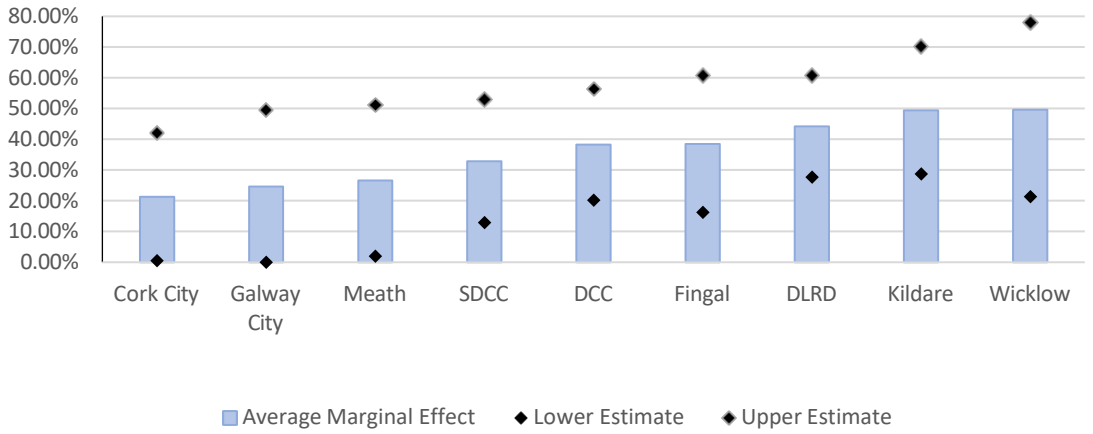
ii) LA Location

The model indicates that SHD sites situated in LA's within the Greater Dublin Area, Cork City, and Galway City have been more likely to commence when compared to SHD sites located elsewhere in the country. While the sign of this effect is consistent across all LAs (i.e., positive), the exact size of these estimates is notably imprecise due to small sample sizes across different Local Authorities. As outlined in **Figure 14,** there is a considerable range between the lower and upper bound on the estimated effect sizes for these LA's. This difference between the lower and upper bound of the estimate ranges from 31.14% in Dun Laoghaire-Rathdown (DLR) to 56.64% in Wicklow, and therefore warrants a degree of caution when interpreting these results.

Given these large confidence intervals, the relative ranking of these effect magnitudes may be a more useful result to consider rather than the exact effect magnitudes themselves. The model suggests the effect has been strongest in Kildare and Wicklow, with SHDs applications located in both

of these LAs being almost 50% more likely to commence. Conversely, the effect is weakest in Cork City and Galway City with average marginal effects of 21.25% and 24.60% respectively.

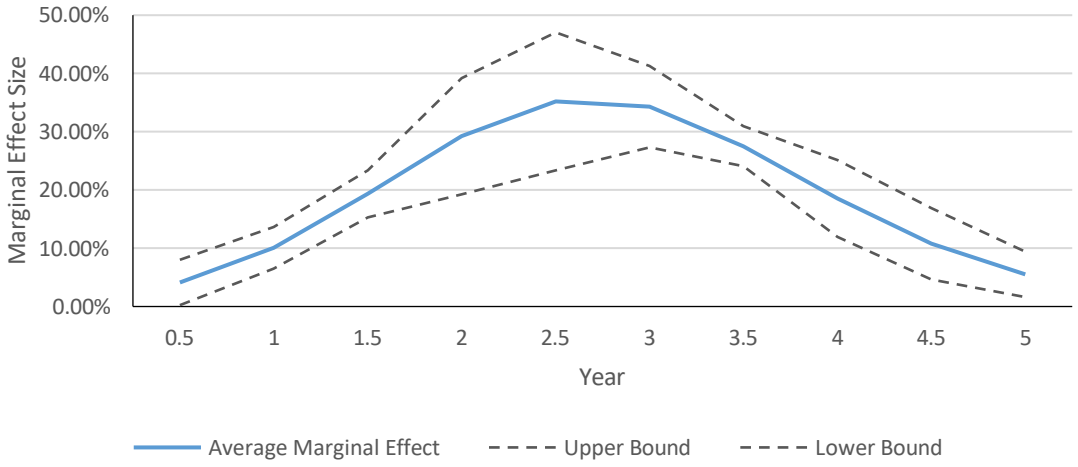
Figure 14 – Average Marginal Effects on Probability of Commencement by Local Authorities



iii) Time since Decision

Figure 15 below outlines the results from Model 1 for the *time since decision* variable. Results indicate that the effect of additional time on the probability of commencement is positive and concave. Over the first two and half years, the effect of additional time on the probability of commencement is positive and increases over time. After the first two and half years, the effect of additional time remains positive but begins to diminish.

Figure 15 – Marginal Effect of Time since Permission (Years) on Probability of Commencement



5. Discussion and Conclusion

The rationale for the introduction of the SHD process was underpinned by the idea that a reduction in the time associated with obtaining planning permission for large scale housing developments would *a) increase the speed at which supply is delivered* and *b) incentivise a greater quantum of supply*.

With respect to the first rationale of the SHD process (to increase the speed at which supply is delivered), the data presented in this note suggests that in cases where a Judicial Review did not occur, the SHD process has been significantly faster compared to processing times for large scale developments prior to 2017 (**Table 7**). Where Judicial Reviews have occurred, the SHD process has still been on average 10- 19 weeks[22] faster than the traditional two-tiered Local Authority process for large scale developments. However, the high prevalence of Judicial Reviews among SHD applications presents a risk to the achievement of shorter planning timeframes. The average time between planning decision and Judicial Review outcome was here found to be 38.3 weeks with significant variation around this average ranging from a minimum of 11 weeks to a maximum of 104 weeks. Data on Judicial Review timing was only available for 21 SHD applications for this analysis. Given the large number of Judicial Reviews yet to conclude, it is difficult to definitively assess whether the SHD process was successful in achieving reduced planning timeframes.

With respect to the second rationale of the SHD process (to incentivise a greater quantum of supply), although headline indicators of supply (commencements and completions) did increase during the period in which SHD's were operational, no counterfactual impact evaluation has been carried out assessing how much of this increase can be attributed to the SHD process.

Rebuilding Ireland (2016) and the report by the SHD review group (2019) noted that a benefit of reduced planning timelines is greater certainty for developers, which may be reflected in the sustained demand for SHD applications from 2019 onwards (**Figure 1**) and the large number of SHD applications submitted in 2022 Q2 prior to the phasing out of the SHD process. Despite sustained demand for SHD planning permission, SHD commencement rates could still be considered less than what might reasonably be expected. The commencement rate across all granted SHD applications as of June 2022 was 38%, accounting for an initial commencement of over 31,000 units within the period. Judicial Reviews have had a substantial negative effect on the commencement rate of SHDs, however the commencement rate of SHD permissions that were not Judicial Reviewed was still just 50%. The commencement rate increases slightly to 58.8% when the most recent year of available data is removed from the calculation to account of a natural lag period between permission and commencement (i.e., 58.8% is the commencement rate of SHD permissions that have had at least one year to start).

[22] 10-week difference in median timelines, 19 week difference in mean timelines.

This analysis identified several factors other than Judicial Reviews that have impacted the commencement of SHDs. SHDs located in the Greater Dublin Area, Cork City, and Galway City have had a higher probability of commencement compared to SHDs located elsewhere. These effects are strongest in Kildare and Wicklow, and weakest in Cork City and Galway City.

Similarly, unit composition and density are relevant factors with additional apartment units and greater net density negatively impacting the probability of commencement. These results are likely indicative of the wider apartment market, higher costs associated with high density apartment developments, the appetite for apartments and their viability.

In terms of the amount of time since obtaining planning permission, the results indicate that the relationship between time and commencement probability is concave. This likely relates to the natural lag between when permission is first granted and when commencement occurs, and also suggests that the effect of additional time on the probability of commencement begins to diminish beyond a certain point which could reflect several factors such as emerging viability constraints, changes to applicant intentions, financing etc.

The analysis also finds strong effects for year specific dummy variables. The average marginal effect of SHD applications granted permission in 2021 and 2022 is negative and the effect is smaller in 2021 compared to 2022 (-27.3% and -44.8% respectively). The smaller magnitude in effect in 2021 relative to 2022 may be partially due to developments in 2021 having more time to commence compared to 2022. Beyond that, these results are difficult to interpret because they could be reflective of any relevant market, cost, regulatory or policy dynamics to have occurred in these years. Given the point in time nature of this analyses, future work could add value by trying to identify these other factors which may impede or delay the utilisation of residential planning permissions.

Finally, with Judicial Reviews acting as a major barrier to the predictability and timeliness of the SHD process, the positive relationship between Judicial Reviews and number of submitted observations outlined above is noteworthy. Applications that receive more public attention appear more likely to be Judicial Reviewed. This could indicate that the Judicial Review process has been acting as a pseudo-appeals mechanism. In this sense, re-introducing the appeals mechanisms for Large Scale Residential Development planning applications following the expiration of the SHD process was likely a positive development from the perspective of alleviating barriers to commencement, and may reduce the prevalence of Judicial Reviews in the future, alongside the new Planning and Development Bill published in December 2023.

5.1 Future Research

More detailed monitoring of Large Scale Residential Developments throughout the entire development cycle is imperative for real time assessment of important aspects of the planning process such as processing time, refusal rates, and planning utilisation rates. Improved monitoring would facilitate evidence-informed policy evaluation and formulation. Improved data collection and monitoring could also provide greater transparency which may even reduce planning uncertainty for developers by making the administrative burden associated with the planning process more predictable.

In terms of a establishing a comparison group to better assess the impact of the SHD process on the supply of dwellings, a comparison of large developments that obtained planning permissions through the traditional Local Authority planning process (i.e., developments of 75-99 units) with SHD developments of relatively similar scale (i.e., SHD permissions of 100 – 125 units) throughout the 2017 to 2022 period could prove useful in assessing the effects of reduced planning timelines on delivery.

Other work could include analysis of commencements that attempts to identify other relevant factors beyond the characteristics of SHD applications, or analysis of the determinants of overall timelines between planning, commencement, and completion. In a similar vein, analysis that attempts to identify drivers of public engagement in the planning process could inform the design of planning policy with appropriate and sustainable mechanisms for public engagement. For example, this note identified considerable variance in the number of observations submitted between SHD applications, with the number of observations weakly correlated with the occurrence of Judicial Reviews. However, why some applications received more observations than others merits further consideration. Variance in public engagement across planning applications might be explained by a variety of factors such as demographics, socio-economic status, the type of proposed developments, and spatial characteristics.

Finally, although the analysis in this paper was not intended or optimised for forecasting, given refined statistical models and improvements to data infrastructure, future research could explore possibilities for a micro approach to forecasting housing supply by tracking and predicting individual housing developments through the various stages of the development cycle.

Appendix 1 – Reason for Refusal Category Examples

Below the name of each refusal category is stated, a short description of the refusal category is given and two typical examples of reasons for refusal in this category are summarised.

Category Name	Category Description
Amenities/design	**Description**: Lack or poor quality of amenities. Design is functionally or aesthetically insufficient. **Examples:** • Overbearing and poor-quality design solution does not meet planning policy requirements. • Large build with poor open space provision and undue overshadowing on adjacent building.
Infrastructure/Servicing	**Description**: Infrastructure needed for development is lacking or insufficient. **Examples**: • Development premature given current deficiencies in water supply. • Substandard pedestrian and cycle connections.
Environmental/biodiversity	**Description**: Adverse environmental consequences or insufficient environmental assessment. **Examples**: • Adversely affects the integrity of a Special Area of Conservation. • Negatively impact nearby ponds.
Flood risk	**Description**: Potential flood risk or insufficient flood risk assessment **Examples**: • No flood risk assessment in area prone to flood. • Insufficient drawings and reports regarding flood risks.
Density	**Description**: Too many/few units given size and location of site as well as planning objectives. **Examples**: • Density contrary to guidelines, too low. • Insufficient density given proximity to Luas.
Unit size	**Description**: Inadequate mix of housings. Units too large or small. **Examples**: • Having few one and two bedroomed units. • Contrary to guidelines. Inadequate mix of housing, units too large.
Zoning	**Description**: Land not zoned for residential development under current development plan. **Examples**: • Contravenes local area zoning plans. • Lands not zoned for release during current development plan.
Protected Structure	**Description**: Development would adversely harm a Protected Structure. **Examples**: • Proposed development has negative impact upon nearby protected structure. • Interference with historic monument.
Other	**Description**: Reason for refusal specific or unique **Examples**: • Development prevents expansion of local GAA club. • Site located in remote and isolated area.

Appendix 2 – Probit Model Outputs

	(1) Time Since Decision	(2) Year of Decision
Constant	-2.7268***	-0.8113
	(0.8785)	(0.6995)
Judicial Reviews	-1.1908***	-1.1520***
	(0.2368)	(0.2433)
Decision Time	-0.001	0.00001
	(0.0030)	(0.0031)
Conditions	0.0181	0.0155
	(0.0216)	(0.0218)
Number of Student Accommodation Spaces	-0.00002	-0.0001
	(0.0004)	(0.0004)
Number of Houses	0.0016	0.0014
	(0.0011)	(0.0011)
Number of Apartments	-0.0013**	-0.0013**
	(0.0006)	(0.0006)
Net Density	-0.0021***	-0.0020***
	(0.0008)	(0.0007)
Dublin City Council	1.4984***	1.5359***
	(0.3962)	(0.4007)
South Dublin County Council	1.3393***	1.3181***
	(0.4266)	(0.4307)
Dun Laoghaire-Rathdown	1.6737***	1.7736***
	(0.3754)	(0.3827)
Fingal	1.6086***	1.5439***
	(0.4737)	(0.4821)
Kildare	1.9832***	1.9832***
	(0.4541)	(0.4653)
Meath	1.0181*	1.0656**
	(0.5205)	(0.5159)
Wicklow	1.8953***	1.9917***
	(0.5906)	(0.6107)
Cork City	0.9073**	0.8526**
	(0.4253)	(0.4335)
Galway City	0.9474*	0.9866*
	(0.5182)	(0.5173)
Time Since Decision	0.0035***	
	(0.0009)	
Time Since Decision Squared	-0.000002***	
	(0.000001)	
2019		-0.2907
		(0.3375)
2020		-0.0166
		(0.3385)
2021		-1.0949***
		(0.3999)
2022		-1.7982***
		(0.5397)
Observations	300	300
Pseudo-R2	0.32	0.34
Adjusted Pseudo-R2	0.23	0.24
Count R2	0.81	0.82

Dependent Variable = 1 if SHD permission commenced as of June 2022.
*p<0.1, **p<0.05, ***p<0.01

Appendix 2.1 - Summary Statistics of Variables included in Probit Model

Variable	Average (Commenced)	Average (Not Commenced)
Judicial Reviews	8.62%	42.93%
Decision Time	106.5	111.3
Conditions	24.9	26.8
Number of Student Accommodation Spaces	78.7	37.9
Number of Houses	80.4	40.9
Number of Apartments	173.1	249.9
Net Density	114.8	169.2
Dublin City Council	19.83%	28.80%
South Dublin County Council	8.62%	8.70%
Dun Laoghaire-Rathdown	25.00%	18.48%
Fingal	7.76%	7.61%
Kildare	13.79%	2.72%
Meath	4.31%	3.26%
Wicklow	4.31%	1.63%
Cork City	6.90%	8.15%
Galway City	4.31%	3.26%
Time Since Decision (Days)	906.9	581.8
2018	16.38%	4.89%
2019	28.45%	19.02%
2020	44.83%	23.91%
2021	8.62%	35.87%
2022	1.72%	16.30%
Total Observations	116	184

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Quality Assurance process (relevant boxes to be ticked)

To ensure accuracy and methodological rigour, the author confirms they have engaged in the following quality assurance process;

✓☐ **Internal/Departmenta**l

- ✓☐ Other internal divisions/sections
- ☐ Peer review (networks, seminars, conferences etc.)
- ✓☐ Line management

✓☐**External**

- ✓☐ Spending Review Subgroup / Technical Review Group
- ☐ Other Government Department
- ☐ Peer review (IGEES network, seminars, conferences etc.)
- ☐ External expert(s)

☐**Other** (relevant details)

✓☐ **Author** (in line Department etc.) has circulated draft paper to relevant Vote in DPENDPR and consulted same **OR** author (in DPENDPR / Votes) has circulated draft paper to relevant line Department and consulted same.

☐ Management Board sign off.