

OPENING STATEMENT

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to

JOINT COMMITTEE MEETING ON HOUSING, LOCAL GOVERNMENT AND
HERITAGE

'URBAN REGENERATION 1 – REPAIR AND LEASE, CPO, DERELICTION
AND VACANCY'

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Introduction

Thank you to the Chair and committee members for inviting me to present on the topic of Urban Regeneration – Repair and Lease, CPO, Dereliction and Vacancy. I am speaking today as a registered architect, Assistant Professor in UCD School of Architecture, Planning and Environmental Policy, and Co-Director of the UCD Centre for Irish Towns.

As a key policy objective of *Ireland 2040: The National Planning Framework*, compact urban settlement – in towns and cities – is acknowledged as fundamental to the future spatial sustainability of the country for several reasons. Firstly, it supports demographic growth predicted to exceed 6 million by 2040. Secondly it allows for the effective use of existing infrastructure – including transport, water supply, sewerage, energy and data. Thirdly it promotes the re-use of buildings already built – and their embodied carbon – over new build and its associated CO2 emissions. Finally compact urban settlement can support social cohesion, through the design of walkable neighbourhoods and good public spaces, that link to well-used amenities and that support inclusive multi-generational access to services, culture, education and business.

This objective is now embedded across policy at all scales in Ireland, including in *Our Rural Future: Rural Development Policy 2021-2025*, *Housing for All: A new Housing Plan for Ireland*, *Climate Action Plan 2021*, Regional Spatial and Economic Strategies for the three regional assemblies, County Development Plans, Local Area Plans and as expected in the forthcoming Town Centre First Policy.

What is less clear is how this policy objective is implemented on the ground, and how challenges facing towns and cities to achieve this objective are addressed effectively. The challenge of vacancy and dereliction – the focus of this meeting – has more recently been broadly acknowledged as a barrier to achieving compact urban settlement.

Report and policy context

Neither vacancy nor dereliction are new phenomena in Ireland. Several important recent studies have looked at vacancy under different lenses. Dr Philip Crowe's report "*How data on vacancy is created and used: Case Studies from Scotland, Denmark and Philadelphia*" analyses and compares methodologies for measuring and understanding vacancy internationally. The report offers clear descriptions of how vacancy is measured and highlights in particular the Vacant Property Indicators Model as used in Philadelphia to combine datasets to predict the likelihood of vacancy at any time.ⁱ

Dr Kathleen Stokes and Dr Cian O'Callaghan's report "*Taking stock of Dublin's vacant sites and properties: A review of existing policies and measures*" notes that vacancy, and the reasons behind it are nuanced and that means and tools to measure it vary. It recommends five key actions with a view to supporting "targeted and effective political responses".ⁱⁱ

Thirdly, the *Town Centre Living Initiative Synthesis Report*, authored SpaceEngagers, documents and analyses the Department of Rural and Community Development's 2018 Pilot Town Centre Living Initiative, whose aim was to test pilot strategies to understand the various causes of and to manage vacancy in town centres in Ireland. The report recommends 15 key actions.ⁱⁱⁱ

A full summary of these three studies is beyond the scope of this statement, but I would like to draw the attention of the committee to them and the recommendations contained therein.

Unfortunately, these reports and studies have not yet translated to action and implementation. It would seem that we have yet to comprehensively understand what we mean by vacancy, who should be charged with tackling it, or how.

Vacancy is not a blanket term. It can vary over time, it can have many causes, it can be temporary or long-term. It can apply to sites, whole buildings, or parts of buildings. It can apply to dwellings, but also to all other types of building. It can be linked with dereliction, but it is not always. A small percentage of building stock will always be vacant and indeed needs to be, in order to allow for regeneration, movement of people and businesses, change of ownership. However, large volumes of long term vacant space, leading to potential dereliction and/or coupled with hoarding of built assets is neither normal, desirable nor sustainable.

Data, and how we measure it

So how do we know the extent of these different types of vacancy? In 2018, as part of *Rebuilding Ireland*, the then Department of Housing, Planning and Local Government published the *National Vacant Housing Reuse Strategy*, which among other actions, called for the establishment of “robust and reliable methods to identify and track vacant property and land”^{iv}.

At the national scale, the Census has the benefits of capturing data with a high degree of accuracy. However it is periodic and only records data on dwellings. GeoDirectory’s quarterly *Residential Building Report* and *Commercial Vacancy Report* provide national snapshots of key metrics of national building stock, including vacancy, holiday homes and dereliction. VacantHomes.ie seeks to engage the public to record and report vacant buildings. At county level, all local authorities are required to maintain separate registers of vacant sites and derelict buildings. In addition, the Heritage Council’s Collaborative Town Centre Health Check programme has conducted baseline reporting of ground floor vacancy in 15 towns and has developed a methodology and knowledge base for building collaboration and partnerships as sustainable methods for ongoing management of town centre regeneration. And in the Government’s newest housing policy, *Housing For All: A new Housing Plan for Ireland*, action 19.12

requires the Department of Finance to “*Collect data on vacancy levels in residential property with a view to introducing a vacant property tax*”.^v

Yet, despite all of this data, the reports, and hundreds of pages of policy, there is still no single department or agency responsible for comprehensively coordinating a programme of mapping, documenting and *understanding* vacancy and land use patterns at the national, regional and local scale. The result is unfortunately a haphazard approach that leaves us, still, without a clear understanding of the scale of vacancy, its underlying causes and necessary actions to ameliorate it.

As Stokes and O’Callaghan point out, “*vacancy and dereliction are symptoms rather than causes of the unequal housing, property and development regimes in Irish towns and cities.*”^{vi} For example, as they point out, less visible forms of vacancy include Short Term Lets, which can have the effect of removing properties from the long term rental market. At the date of writing, Westport in Co. Mayo, has only 2 available dwellings to rent listed on Daft.ie, despite there being 252 available short term let Airbnb options. This is under-the-radar vacancy, but it is vacancy that has a significant impact on the sustainability of the town nonetheless.

This lack of a coordinated approach to town centres and city districts means that buildings, valuable assets, connected to expensive infrastructure, and full of embodied carbon, all of which are owned *by someone*, sit idle. Meanwhile long term homeless figures are again rising, at 8130 in Focus Ireland’s October report.^{vii} From ongoing research and experience in this area I make the following observations:

Asking the right questions

We already have access to significant amounts of data, but are we asking the right questions? Are we asking the difficult questions? We also have ample legislation

and policy. But there is a curious lack of action and accountability. Why is this? Why is there a reluctance to collect vacant site levies? Why are the powers of the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015, which include CPO and levy powers, not used to their capacity? Why is the ownership of all property not in the public domain, when in other countries this information is a matter of public record and interest? An outsider looking on might be justifiably confused and wonder whether it might be the case that the status quo, of empty untaxed assets – be they vacant, derelict or used for short term lets, buildings that are held onto, as quasi pensions – actually suits us? Otherwise, why would we not simply do the work that is already mandated in policy and legislation?

A single point of responsibility and partnership

A coordinated, supportive, partnership approach is needed, which Ireland currently lacks. We could learn from our neighbours in Scotland, where, faced with similar challenges, they have developed an exemplary framework, informed by its Town Centre First approach, which combines a single comparative data platform, Understanding Scottish Places; the USP Your Town Audit, Place Standard and Town Centre Toolkits within a supportive mechanism of the Scotland's Towns Partnership. Scotland's Towns Partnership ensures that knowledge is shared and comparable, that actions are coordinated, that a partnership approach to compact urban settlement is collaboratively developed and delivered at all scales, from national to local, while still respecting the unique character of towns and city districts. The Heritage Council and the UCD Centre for Irish Towns have built good relationships with colleagues in the Scotland's Towns Partnership and the University of Edinburgh and they have already generously shared their knowledge and experience and stand willing to help.

Coordinated and collaborative approach

Towns and cities are unique places, and no one size fits all solution will work for every place. Equally, fixing vacancy and dereliction on its own is not going to *fix* towns. However, a partnership approach, informed by publicly available,

comparable data, could connect with local authorities and communities in towns to support common baseline audits, and in parallel and of equal importance, help develop locally tailored, participatory vision plans, that support compact urban places, to be connected, climate resilient, healthy and beautiful places to live. Progress and action can then be managed and assessed relative to baseline checks and goals, unique to each place, but coordinated nationally. The recently announced Town Centre Actions Plans are welcomed, but it is suggested that they will be of more value, if coordinated by a single partnership and based on a common structure.

Conclusion

We should be actively implementing existing CPO and levy powers. But unless we also understand our towns and cities at a granular scale, as well as the macro forces that continue to shape them, and can benchmark mark them both In time and space relative to one another, we will remain unable to imagine to them as they could be. A coordinated approach, using common metrics, participatory tools, and methodologies, within an open, supportive and participatory framework that harnesses design skills to respond to the unique conditions of people and place is essential.

References:

Ireland 2040: National Planning Framework
Scotland's Towns Partnership <https://www.scotlandstowns.org/>
Understanding Scottish Places www.usp.scot.uk
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<https://www.heritagecouncil.ie/projects/town-centre-health-check-programme>

ⁱ Dr Philip Crowe (2019) How data on vacancy is created and used: Case Studies from Scotland, Denmark and Philadelphia. Heritage Council and The housing Agency.

ⁱⁱ Dr Kathleen Stokes and Dr Cian O'Callaghan (2021) Taking Stock of Dublin's vacant sites and properties: A review of existing policies and measures. Department of Geography, Trinity College Dublin.

ⁱⁱⁱ Space Engagers (2020) The Town Centre Living Initiative Six Pilot Towns: Synthesis Report. Dublin, Department of Rural and Community Development.

^{iv} National Vacant Housing Reuse Strategy 2018-2021

^v Department of Housing, Local Government and Heritage (2021) Housing For All: A New Housing Plan for Ireland.

^{vi} Stokes and O'Callaghan (2021) *We need to change how we think about urban vacancy*, in Dublin Inquirer, February 2021.

^{vii} Focus Ireland: Knowledge Hub <https://www.focusireland.ie/knowledge-hub/latest-figures/>