

# Taking stock of Dublin's vacant sites and properties: A review of existing policies and measures

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## Table of Contents

ACRONYM KEY .....	3
FIGURES .....	3
EXECUTIVE SUMMARY .....	4
1. INTRODUCTION .....	5
2. POLICY CONTEXT .....	6
2.1 DECLINE AND DERELICTION .....	7
2.2 POST-CRASH VACANCY .....	9
2.3 VACANT PROPERTIES AMIDST A HOUSING CRISIS .....	11
2.4 VACANCY DURING (AND BEYOND) COVID-19 .....	14
2.5 ASSESSING THE POLICY CONTEXT .....	16
3. VACANCY MEASURES AND DATASETS .....	18
3.1 NATIONAL MEASURES .....	19
3.2 LOCAL EFFORTS .....	21
3.3 CROWDSOURCING AND PUBLIC MAPS .....	24
3.4 ADJACENT/SECONDARY DATASETS .....	25
3.5 ASSESSING DUBLIN'S MEASURES .....	27
4. PRELIMINARY RECOMMENDATIONS .....	30
6. CONCLUSION AND NEXT STEPS .....	33
APPENDIX ONE: SUMMARY TABLE OF VACANCY MEASURES FOR DUBLIN .....	34
APPENDIX TWO: TOWARDS A TYPOLOGY FOR URBAN VACANCY .....	36
PROVISIONAL TYPOLOGY OF URBAN VACANCY FOR DUBLIN .....	39

## **Acronym Key**

AHB – Approved Housing Body

DCC – Dublin City Council

DHO – Dublin Housing Observatory

LA – Local Authority

NAMA – National Asset Management Agency

NOAC – National Oversight and Audit Commission

OSi – Ordnance Survey Ireland

STL – Short Term Let

VHO – Vacant Homes Officer

VHU – Vacant Homes Unit

## **Figures**

Figure 1. Policy Timeline – page 17

## **Executive summary**

In this report, we are concerned with the current and recent context of vacancy in Dublin. Vacancy has been a persistent long-term feature of Dublin's urban landscape throughout periods of growth and recession, to this day. By examining the current political context surrounding urban vacancy and associated measures, this report endeavours to offer a deeper understanding of how vacancy is politically understood and responded to in Dublin, and Ireland more generally.

In considering the policy context for vacancy, four distinct yet overlapping framings are outlined: decline and dereliction, post-crash vacancy, vacancy amidst a housing crisis, and vacancy during the Covid-19 pandemic. Following this review, the report introduces and analyses the current approaches to identifying and measuring vacancy in Dublin by distinguishing between national efforts, local government approaches, crowdsourcing and public mapping, and adjacent/secondary datasets.

The report concludes with five preliminary recommendations for improving current political definitions, measures, and responses in Ireland, along with a provisional typology for urban vacancy in Dublin. Overall, its findings seek to contribute towards the development of clearer, and more nuanced understandings of vacancy in Dublin, with a view to supporting more targeted and effective political responses.

Analysis is based on a review of academic literature, legislation and policies, government documents, market reports, vacancy measures and datasets, as well as maps. Interviews, site visits, and media analysis have also taken place in tandem with this report. While not the primary focus of this report, they have been considered in preparing the analysis and recommendations.

This report is the first output of the Irish Research Council-funded Rethinking Urban Vacancy research project led by Dr Cian O'Callaghan. Subsequent findings will be disseminated in the coming months through a second policy report, public event, and academic journal articles.

## 1. Introduction

Urban vacancy is a complex and often invisible issue in cities, which comes into focus during particular moments of politicisation and/or policy intervention. These moments generally relate to specific challenges underscoring particular elements of vacancy (e.g. whether this be a focus on vacant land, vacant housing stock, or commercial property). As such, the policy context tends to be composed of long-term and more generalised planning measures combined with targeted interventions that seek to respond to particular policy problems of the moment.

In this report, we are concerned with the current and recent context of vacancy in Dublin. We therefore aim to do three things. Firstly, we offer a short background of the policy and planning framework relating to vacancy in Dublin, outlining key recent policy interventions at the national and local levels. Secondly, we review and analyse existing vacancy measures and datasets to understand what information is currently being gathered, and by whom. Finally, we offer preliminary recommendations for working towards a more nuanced and responsive approach to understanding and identifying urban vacancy in Ireland, along with a provisional typology of urban vacancy for Dublin.

The findings presented in this report are based on two parallel research activities: desk analysis of policies, legislation, academic literature, and other documents related to vacancy in Dublin, alongside qualitative analysis of existing datasets and vacancy measures. In addition to these primary research activities, the report's questions and structure have been informed by parallel conversations and interviews with government officials and stakeholders, and recent media coverage of vacancy. Research and analysis were primarily undertaken between December 2019 and April 2020, with revisions and updates occurring between November 2020 and January 2021.

By examining the current political context surrounding urban vacancy and associated measures, this report offers a deeper understanding of how vacancy is politically understood and responded to in Dublin. Together, this analysis underpins recommendations for rethinking how urban vacancy is currently defined, measured, and identified within Dublin, and Ireland more generally. These recommendations will also inform ongoing research by the report authors and contribute towards a broader programme of research by the authors.

## 2. Policy context

Vacancy has been a persistent long-term feature of Dublin's urban landscape throughout periods of growth and recession.<sup>1</sup> For example, in nineteenth century Dublin 'dereliction' was a weighty political issue associated with 'wastefulness',<sup>2</sup> while the condition of housing stock again became politically contentious in the early twentieth century leading to a 1913 enquiry into tenements and, ultimately, public housing projects in Marino.<sup>3</sup> Aside from housing, the issue of vacant land has also ebbed and flowed with changing patterns of urbanisation in Dublin. During the 1980s, there was widespread debate about the proliferation of vacant lots as an outcome of de-industrialisation, with charges made that Dublin was turning into a city of surface-level car parks at the same time as important historic buildings were being demolished.<sup>4</sup> Following the property crash of 2008, vacancy again became a key area of policy concern in response to extensive vacant and unfinished developments.<sup>5</sup>

What this brief sketch highlights is not so much that Dublin has been characterised by problems of decline in the past, but rather that vacancy has been an ongoing feature of urban environments more generally.<sup>6</sup> Such an understanding requires us to rethink urban vacancy, to shift our focus from vacancy as simply a problem to be solved and towards seeing it as multidimensional. While resolving problems of vacancy has been a recurrent policy trend in Dublin, in fact these have targeted different forms of vacancy and have been in response to specific policy and political challenges.

This section provides a brief overview of the prevailing political framings of, and responses to, urban vacancy in Dublin. The aim is to explicitly foreground two key questions: which types of vacancy have been the focus of policy? And, what specific policy measures have been put in place? This is not intended to be exhaustive, but rather to identify which types of vacancy have been targeted for intervention and in what ways.

Focusing on the last four decades, we identify four key political agendas: urban decline and dereliction, post-crash vacancy, vacant properties amidst a housing crisis, and vacancy during Covid-19. While distinct, each

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<sup>1</sup> Kearns, G. (2016) Vacancy and housing in Dublin: 1798-1911. *Irish Geography*, 48(1), 13-36; MacLaran, A. (1993) *Dublin: The Shaping of a Capital*. London: Belhaven Press; O'Callaghan, C. & Lawton, P. (2016). Temporary solutions? Vacant space policy and strategies for re-use in Dublin. *Irish Geography*, 48(1), 69-87.

<sup>2</sup> Kearns, G. (2016) Vacancy and housing in Dublin: 1798-1911. *Irish Geography*, 48(1), 13-36.

<sup>3</sup> Brady, J. & McManus, R. (2018) Marino at 100: A garden suburb of lasting influence. *Irish Geography*, 51(1), 1-24.

<sup>4</sup> McDonald, F. (1985) *The destruction of Dublin*. Dublin: Gill & Macmillan.

<sup>5</sup> Kitchin, R., O'Callaghan, C., Boyle, M., Gleeson, J. & Keaveney, K. (2012) Placing neoliberalism: the rise and fall of Ireland's Celtic Tiger. *Environment and Planning A*, 44(6), 1302-1326; O'Callaghan, C. & Lawton, P. (2016). Temporary solutions? Vacant space policy and strategies for re-use in Dublin. *Irish Geography*, 48(1), 69-87.

<sup>6</sup> Crowe, P. & Foley, K. (2016) Patrick Geddes as Social-ecologist: A century of mapping underused spaces in Dublin. *International Planning History Society Proceedings*, 17(2).

agenda presents vacancy as a symptom of broader problems surrounding urban growth, development, and justice in Dublin. Moreover, we recognise that these agendas are not mutually exclusive and have frequently overlapped and informed one another at different points. Below we outline the particularities of each political agenda, outlining how they have understood and responded to vacancy.

## 2.1 Decline and dereliction

During the 19<sup>th</sup> and 20<sup>th</sup> century, Dublin was marked by periods of severe urban economic decline and social deprivation and related urban physical decay. By the 1980s, the challenge of urban decline in Dublin was recognised as a political problem.<sup>7</sup> By 1986 it was estimated that there were 600 sites and derelict buildings, which together comprised 65 hectares in Dublin.<sup>8</sup> While much of this dereliction could be linked to site assembly by developers and property speculators, it nevertheless resulted in perceptions of blight. Dereliction and vacancy were both peppered throughout the city centre – in the form of surface car parks for example – and concentrated in large areas like Temple Bar. Like other urban centres dealing with problems of decline, this resulted in a patchwork city composed of areas of growth, decline, and abandonment.

The response to vacancy and decline in Dublin during the 1980s was met on two fronts. On the one hand, a set of new policies promoting urban regeneration was rolled out at the national level. The **1986 Urban Renewal Act** and the **1987 Finance Act** were instrumental in shifting towards targeted entrepreneurial or proactive approaches to urban development. These policies provided for the establishment of ‘designated areas’ for urban renewal, most prominently the area around Custom House Docks (1986) and later leading to the establishment in 1997 of the Dublin Docklands Development Authority.<sup>9</sup> They also introduced tax incentives to promote the development, refurbishment and occupation of properties in these designated areas. These are broadly understood to have put in place the urban policy, planning, and market frameworks that enabled the Celtic Tiger growth model during the 1990s. These policy approaches provided a mechanism for regenerating large swathes of city centre space.

On the other hand, the **1990 Derelict Sites Act**<sup>10</sup> gave local authorities the power to issue compulsory purchase notices on specific sites and premises defined as derelict. Dereliction was defined as:

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<sup>7</sup> McDonald, F. (1985) *The destruction of Dublin*. Dublin: Gill & Macmillan.

<sup>8</sup> MacLaran, A. (1993) *Dublin: The Shaping of a Capital*. London: Belhaven Press, 121.

<sup>9</sup> Moore, N. (2008) *Dublin docklands reinvented: the post-industrial regeneration of a European city quarter*. Dublin: Four Courts Press Ltd.

<sup>10</sup> *Derelict Sites Act, 1990*. Accessed: <http://www.irishstatutebook.ie/eli/1990/act/14/enacted/en/html>

“any land (in this section referred to as “the land in question”) which detracts, or is likely to detract, to a material degree from the amenity, character or appearance of land in the neighbourhood of the land in question because of—

- (a) the existence on the land in question of structures which are in a ruinous, derelict or dangerous condition, or
- (b) the neglected, unsightly or objectionable condition of the land or any structures on the land in question, or
- (c) the presence, deposit or collection on the land in question of any litter, rubbish, debris or waste, except where the presence, deposit or collection of such litter, rubbish, debris or waste results from the exercise of a right conferred by statute or by common law.”<sup>11</sup>

This definition attended to the aesthetic quality of dereliction, emphasizing its negative impact on surrounding areas. It explicitly noted neglected and unsightly conditions, ruined, derelict or dangerous structures as well as the presence or accumulation of waste. In turn, local authorities were required to identify and respond to reported dereliction by establishing and maintaining a Derelict Sites Register, issuing statutory notices, and collecting levies from owners of derelict sites. In theory, these powers gave local authorities a tool to address and combat blight. However, the process was potentially a costly and lengthy one for local authorities who needed to have the finance to purchase sites identified, as well as contesting owners seeking arbitration to hold onto their property.

The emerging tensions of Dublin’s urban governance regime were, thus, reflected in this combined set of policy approaches. One set of approaches targeted large parts of the city for urban regeneration under master-planned approaches initially led by the national government and via quangos like the Dublin Docklands Development Authority. During the 1990s, this approach was mirrored by Dublin City Council (DCC) through the Integrated Area Plan approach to the redevelopment of particular city centre locales, while the Derelict Sites Act operated on a smaller scale to target particular types of vacancy. If these policies enabled large-scale transformations of areas of perceived dereliction, the Derelict Sites Act provided a mechanism to target specific sites in limited ways. Thus, through market-based approaches to urban regeneration, the widespread transformation of the city was enabled. However, outside of these large projects, the powers of local authorities to intervene to address issues of vacancy or dereliction remained limited.

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<sup>11</sup> *Derelict Sites Act, 1990*, article 3. Accessed: <http://www.irishstatutebook.ie/eli/1990/act/14/section/3/enacted/en/html#sec3>



The impacts of the urban regeneration schemes set in motion by the Urban Renewal Act were expanded and accelerated during the Celtic Tiger period of economic growth. During the 1990s, largescale state-led urban regeneration projects in areas of Dublin docklands and Temple Bar were implemented. The transformation of the urban fabric was directed towards reshaping of Ireland's economy and culture through the opening up of the country to globalisation<sup>12</sup>. While the urban development approach undoubtedly paid dividends in clearing large swathes of the city of dereliction and in creating the grounds for a more active property development sector and market, this was not without nascent problems. From 2002, the initial phase of export-led growth was replaced by an increasingly debt-fuelled property bubble, with speculative construction projects driving economic growth in the place of now established foreign direct investment, which had driven the transformations of the 1990s.<sup>13</sup> As has been well documented, the form that urban development took during this period was and fiscal, incentivized by urban policy, and relied on leveraging the speculative increase in land values to stimulate activity in the property market.<sup>14</sup> As such, underlying problems of land hoarding and speculation, which had been identified throughout the 1980s, became both cloaked and arguably exacerbated during the Celtic Tiger property bubble during the 2000s. Moreover, the limited statutory powers of Local Authorities meant that other forms of vacancy remained unaddressed.

## 2.2 Post-crash vacancy

The problem of vacancy would reassert itself in new ways with the 2008 global financial crash. Whereas public concern over vacancy had previously been dominated by political responses to older forms of dereliction, the sudden crash of Ireland's speculative property market resulted in a landscape of unfinished residential and commercial developments.<sup>15</sup> The National Survey of Housing Developments in 2010 documented 2846 unfinished estates in Ireland, present in every local authority, of which only 429 still had active construction happening on them.<sup>16</sup> Unfinished estates, in particular, became a potent symbol and component of Ireland's property crash and associated economic crisis, as well as a focus of policy interventions. Moreover, these new forms challenged established norms about what vacancy looked like and

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<sup>12</sup> O'Riain, S. (2004) *The politics of high tech growth: Developmental network states in the global economy*. Cambridge: Cambridge University Press.; Lawton, P., & Punch, M. (2014) Urban Governance and the 'European City': Ideals and Realities in Dublin, Ireland. *International Journal of Urban and Regional Research*, 38(3), 864-885.

<sup>13</sup> Riain, S. Ó. (2014) *The Rise and Fall of Ireland's Celtic Tiger: Liberalism, Boom and Bust*. Cambridge: Cambridge University Press.

<sup>14</sup> Kitchin, R., O'Callaghan, C., Boyle, M., Gleeson, J. & Keaveney, K. (2012) Placing neoliberalism: the rise and fall of Ireland's Celtic Tiger. *Environment and Planning A*, 44(6), 1302-1326; MacLaran, A. & Kelly, S. (Eds) (2014) *Neoliberal Urban Policy and the Transformation of the City: Reshaping Dublin*. London: Palgrave Macmillan.

<sup>15</sup> Kitchin, R., O'Callaghan, C. & Gleeson, J. (2014) The New Ruins of Ireland? Unfinished Estates in the Post-Celtic Tiger Era. *International Journal of Urban and Regional Research*, 38(3), 1069-1080.

<sup>16</sup> The Housing Agency. (2010) *National Survey of Ongoing Housing Developments: October 2010*. The Housing Agency, Department of the Environment, Heritage and Local Government. Accessed: <https://www.housingagency.ie/sites/default/files/2010-National-Housing-Survey-Results.pdf>

its underlying causes. Whereas previous discussions had focused on dereliction – properties let fall into disuse – the unfinished estates of the post-crash era implicated the development system itself as leading to vacancy through the speculative oversupply of housing and commercial space. This also opened up a wider policy discussion on vacant land in urban areas<sup>17</sup>. Thus, in the post-crash context vacancy became a prominent policy issue that was explored in new ways.

While vacancy was a key area of public discussion and policy focus during this period, the policy response was itself fragmented and uneven. On the one hand, the resolution of commercial vacancy, vacant development land, and some larger residential developments in Dublin was enabled by the creation of the **National Asset Management Agency (NAMA) in 2009**. NAMA was a mechanism to resolve the country's financial crisis by taking on €74 billion of distressed property loans associated with the five main Irish banks. Through strategies to dispose of their loan book, NAMA oversaw the transfer of vast swathes of development land and property in Dublin to international financial actors.<sup>18</sup> This approach to resolving vacancy broadly continued the market-based approaches of earlier urban regeneration strategies.<sup>19</sup> On the other hand, the resolution of residential vacancy and unfinished estates was rolled out in a light touch manner, which largely left local authorities with responsibility, while being given only limited resources to do so by central government. The resources that were made available included the establishment of the Social Housing Leasing Initiative in 2009, Site Resolution Plans (SRPs) including a safety fund of €5 million in 2011, and a Special Resolution Fund (c. €13million) in 2014 to target problems on the very worst estates. These measures worked with the grain of market forces, required voluntary buy-in from developers and financial institutions and often only implemented basic remedial works on unfinished estates. As such, they broadly continued an approach that offered local authorities only limited powers to intervene in specific vacant sites and properties.

The property crash also stimulated a policy discussion around vacant development land in city centres, and particularly Dublin. A slowdown in development activity served to expose the extensive vacant land and properties that remained despite the preceding construction bubble. An audit of vacant land in the city centre published in 2015 estimating a total of 61 hectares of vacant or derelict land within its boundaries,

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<sup>17</sup> See, for example, Brownfield Initiative Steering Group (2013) *Second update on work programme (December 2013)*. Dublin: Dublin City Council.

<sup>18</sup> Byrne, M. (2016) Asset price urbanism and financialization after the crisis: Ireland's National Asset Management Agency. *International Journal of Urban and Regional Research*, 40(1), 31–45.

<sup>19</sup> Byrne, M. (2016) Entrepreneurial Urbanism After the Crisis: Ireland's "Bad Bank" and the Redevelopment of Dublin's Docklands. *Antipode*, 48(4), 899–918; Moore-Cherry, N. (2020) Urban redevelopment, governance and vulnerability: thirty years of 'regeneration' in Dublin. *Boletín de la Asociación de Geógrafos Españoles*, (87).

equivalent to 4% of zoned inner city lands.<sup>20</sup> Dublin City Council also set up of a Brownfield Task Force in 2013, encouraged temporary use projects and spearheaded a proposal to introduce a Vacant Site Levy (VSL). The VSL was introduced at a rate of 3 per cent of market value nationwide from 2018. The **Planning and Development (Amendment) Act 2018** increased this rate to 7 per cent from 2019,<sup>21</sup> though there have been noted challenges to implementing and administering it.<sup>22</sup> While speaking to broader challenges surrounding housing and urban development, the **2015 Urban Regeneration and Housing Act** specified that vacant sites were a local authority responsibility.<sup>23</sup> Similar to derelict sites, local authorities were now required to establish and manage both a vacant sites register and collect a levy. By highlighting vacancy as a problem facing cities and their residents, vacancy would reappear in a number of subsequent government plans and schemes.

### 2.3 Vacant properties amidst a housing crisis

If the challenge following the crash was excessive vacancy, in a few short years this shifted again to a challenge of insufficient supply of affordable housing. Within this context, various policy initiatives have sought to identify and target available vacant housing stock to bring it back into use. While vacancy and housing have always been closely related in policy, the accelerated rise in property prices and intensifying homelessness within Dublin has led to a particular set of policies, strategies and schemes aimed at using vacant dwellings to address Ireland's housing and homelessness crisis. As Ireland's land and property markets have gradually returned to pre-crash levels, concern over vacancy has expanded from incomplete sites and developments to increasingly consider individual properties and dwellings.

Following the 2015 Urban Regeneration and Housing Act, the national government published its action plan for housing and homelessness in 2016 entitled **Rebuilding Ireland**.<sup>24</sup> The plan aimed to provide an overarching framework for housing provision, as well as targeted responses to homelessness. One pillar of this approach has been to incentivise the supply of new housing. To encourage private supply, the government introduced Strategic Housing Development planning procedures in 2017,<sup>25</sup> which offered a fast-

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<sup>20</sup> Dublin City Council. (2015) *Dublin inner city vacant land study*. Dublin: Dublin City Council.

<sup>21</sup> *Planning and Development (Amendment) Act, 2018*. Accessed: <http://www.irishstatutebook.ie/eli/2018/act/16/enacted/en/html>

<sup>22</sup> Parliamentary Budget Office. (2020) *Challenges in implementing and administering the Vacant Site Levy, PBO Publication 29 of 2020*. Dublin: Houses of the Oireachtas. Accessed: [https://data.oireachtas.ie/ie/oireachtas/parliamentaryBudgetOffice/2020/2020-05-21\\_challenges-in-implementing-and-administering-the-vacant-site-levy\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/parliamentaryBudgetOffice/2020/2020-05-21_challenges-in-implementing-and-administering-the-vacant-site-levy_en.pdf)

<sup>23</sup> *Urban Regeneration and Housing Act, 2015*. Accessed: <http://www.irishstatutebook.ie/eli/2015/act/33/enacted/en/html>

<sup>24</sup> *Rebuilding Ireland Action Plan for Housing and Homelessness. Rebuilding Ireland*. (2016) Accessed: <https://rebuildingireland.ie/>

<sup>25</sup> An Bord Pleanála. (2017) *Strategic Housing Development Planning Applications Overview: Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017*. Accessed: <http://www.pleanala.ie/shd/general/overview/Strategic%20Housing%20Developments%20-%20Overview.pdf>

track pathway for planning permissions. Also significant was the creation of the Land Development Agency in 2018, which has a remit to work with, “state bodies and local authorities to make more effective use of State lands, providing a stable, sustainable supply of land for housing.”<sup>26</sup> These measures targeted vacant land for redevelopment and continued existing urban development processes.

However, Rebuilding Ireland also sought to target existing vacancy by including ‘utilising existing housing’ as its fifth foundational pillar.<sup>27</sup> In particular, pillar five announced a number of objectives and schemes to support local authorities and the private sector in making vacant housing viable and available for use. In particular, the plan’s objectives centred primarily purchasing vacant homes, removing regulatory barriers, urban regeneration and rural renewal. Additionally, the **Repair and Leasing Scheme (RLS)** would provide funding for repairs to owners of vacant properties, which would then be rented out as social housing for between 5 to 20 years.<sup>28</sup>

In addition to these schemes, the Department of Housing responded to *Rebuilding Ireland* by publishing a **National Vacant Housing Reuse Strategy 2018-2021** in 2017.<sup>29</sup> The National Vacant Housing Reuse Strategy is also significant insofar as it announced a number of new, dedicated imperatives. Furthermore, the strategy constituted the first concerted effort to draw up an overarching approach to measuring and addressing housing vacancy, and bringing together various actors. The ambition is framed through the five core objectives of the strategy:

1. Establish robust, accurate, consistent and up-to-date data sets on vacancy.
2. Bring forward measures to ensure, to the greatest degree possible, that vacant and underused privately owned properties are brought back to use.
3. Bring forward measures to minimise vacancy arising in Social Housing Stock.
4. Continued engagement with and provision of support to key stakeholders to ensure suitable vacant properties held by banks, financial institutions and investors are acquired for social housing use.
5. Foster and develop cross-sector relationships, collaborating in partnership to tackle vacant housing matters.

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<sup>26</sup> Land Development Agency (2021) About Us. *Land Development Agency*. Accessed: <https://lda.ie/about/>

<sup>27</sup> Utilise Existing Housing. (2016) *Rebuilding Ireland*. Accessed: <https://rebuildingireland.ie/utilise-existing-housing/>

<sup>28</sup> Repair and Leasing Scheme. (n.d.) *Rebuilding Ireland*. Accessed: <https://rebuildingireland.ie/repair-and-leasing-scheme/>

<sup>29</sup> Department of Housing, Local Government and Heritage. (2018) National Vacant Housing Reuse Strategy. *Government of Ireland*. Executive summary accessed: <https://www.housing.gov.ie/housing/home-ownership/vacant-homes/national-vacant-housing-reuse-strategy-executive-summary>; Full report accessed: <https://www.housing.gov.ie/housing/home-ownership/vacant-homes/national-vacant-housing-reuse-strategy>

The strategy announced the formation of a **Vacant Homes Unit** within the Department, as well as a pilot survey for identifying vacant homes. Equally, it stipulated that local authorities must appoint a Vacant Homes Officer, produce Vacant Homes Action Plans, and explore statutory options such as compulsory purchase orders.

Along with reiterating *Rebuilding Ireland's* Repair and Leasing scheme, the strategy also introduced a **Buy and Renew Scheme (BRS)** to provide financial assistance to local authorities and Approved Housing Bodies (AHBs) to purchase and improve vacant properties for the purposes of providing social housing.<sup>30</sup> The Long Term Leasing Initiative (initially launched as a mechanism to bring dwellings on unfinished estates back into use) is also referenced as a vehicle for local authorities to secure housing from private property owners.<sup>31</sup> Dublin City Council has actively promoted both schemes to the public, but the extent of uptake is unclear.<sup>32</sup> Finally, the strategy sought to respond to planning and regulatory hurdles surrounding vacancy. Certain commercial premises would become exempt from planning permissions when turned into residential use.<sup>33</sup> Furthermore, a working group of representatives from the department and local authorities would also publish a **Bringing Back Homes manual** in 2018, which provided regulatory procedures for redevelopment.<sup>34</sup>

In tandem with *Rebuilding Ireland's* suite of policies and initiatives, government efforts have also sought to encourage the regeneration of city and town centres for residential living in recent years. Revenue has established the **Living City Initiative**, which provides tax incentives for the refurbishment of properties in Special Regeneration Areas in six cities: Cork, Dublin, Galway, Kilkenny, Limerick, and Waterford.<sup>35</sup> Vacant and derelict properties are of particular applicability to this scheme, as are vacant units over shops. Outside of cities, the Department of Rural and Community Development piloted the **Town Centre Living Initiative**, which encourages residential occupancy in town centres, including the reuse of vacant properties. In the

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<sup>30</sup> Rebuilding Ireland, VacantHomes.ie. & The Public Sector Magazine (n.d.) Buy & Renew Scheme – Aims to support Local Authorities and Approved Housing Bodies to Purchase and Renew Housing Units. *VacantHomes.ie*. Accessed: <https://vacanthomes.ie/buy-renew-scheme-aims-to-support-local-authorities-and-approved-housing-bodies-to-purchase-and-renew-housing-units/>

<sup>31</sup> Department of Housing, Local Government and Heritage. (2018) National Vacant Housing Reuse Strategy. *Government of Ireland*. Accessed: <https://www.housing.gov.ie/housing/home-ownership/vacant-homes/national-vacant-housing-reuse-strategy>

<sup>32</sup> (2021) Vacant Homes. *Dublin City Council*. Accessed: <https://www.dublincity.ie/residential/housing/i-own-my-home/vacant-homes>

<sup>33</sup> Department of Housing, Local Government and Heritage. (2018) Circular PL 01/2018 Amendments to the Exempted Development Provisions in the Planning and Development Regulations. *Government of Ireland*. Accessed: <https://www.housing.gov.ie/planning/development-management/circular-pl-012018-amendments-exempted-development-provisions>

<sup>34</sup> Department of Housing, Local Government and Heritage. (2018) Bringing Back Homes - Manual for the Reuse of Existing Buildings. *Government of Ireland*. Accessed: <https://www.housing.gov.ie/housing/home-ownership/vacant-homes/bringing-back-homes-manual-reuse-existing-buildings>; Department of Housing, Local Government and Heritage. (2020). Final Report of the Working Group on the Reuse of Existing Buildings. *Government of Ireland*. Accessed: <https://www.housing.gov.ie/housing/home-ownership/vacant-homes/final-report-working-group-reuse-existing-buildings>

<sup>35</sup> (21 February 2020) Living City Initiative (LCI). *Revenue.ie*. Accessed: <https://www.revenue.ie/en/property/living-city-initiative/index.aspx>

pilot phase, €100,000 was provided to six rural towns to “to develop innovative proposals that encourage the reuse of vacant and underused buildings in town centres for living.”<sup>36</sup> The pilot was independently reviewed by Space Engagers, in a commissioned report published in June 2020.<sup>37</sup>

In addition to public sector strategies, Approved Housing Bodies (AHBs) such as Peter McVerry Trust have also endeavoured to identify and bring vacant buildings/sites back into use, both independently and in cooperation with local authorities.<sup>38</sup> There have also been efforts to reform Short Term Lets (STLs) (such as Airbnb) with legislation and regulations that call for planning permission in Rent Pressure Zones effective from 1 June 2019.<sup>39</sup> Although the issue is more broadly related to concerns that STL are removing housing stock that could be long-term rental use, there is an implicit understanding here that STL may also constitute a form of short-term vacancy.

While marking a new imperative to understand vacancy as a holistic challenge, this set of policy approaches has nevertheless been focused specifically on the question of identifying and bringing *vacant housing units* back into use. As such, recent policy interventions have been less focused on other forms of vacancy. With regard to the core aim of bringing vacant housing stock back into use, thus far the set of policies have had mixed success. Indeed, the concentrated policy emphasis has also revealed challenges related to identifying vacant stock and bringing it back into use.

## 2.4 Vacancy during (and beyond) Covid-19

While vacancy has been a consistent concern within Irish housing and urban regeneration policy in recent decades, different aspects and forms have been privileged (or ignored) in response to changing circumstances. The changing nature of urban vacancy and associated policy responses was brought into focus while writing this report. The Covid-19 global pandemic led to a sudden mass lockdown and overnight transformation of housing rights and commercial property markets. In the early months of the pandemic,

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<sup>36</sup> Space Engagers. (2020) The Town Centre Living Initiative: Six Pilot Towns: Synthesis Report. *Department of Rural and Community Development*. Accessed: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/77498/3b9f04d1-987f-4ed9-ac4c-750162e3f2a6.pdf#page=null>

<sup>37</sup> Ibid.

<sup>38</sup> For instance, Peter McVerry Trust converted vacant DCC complex St Agatha’s Court into social housing in 2017. For further information, see: <https://pmvtrust.ie/housing/housing-projects/st-agathas-court/>

<sup>39</sup> For more information: Planning and Urban Form SPC. (25 February 2020) Introduction to Short Term Letting Legislation and Enforcement. *Dublin City Council*. Accessed: <https://councilmeetings.dublincity.ie/mgConvert2PDF.aspx?ID=27446>; (2021) [Rebuilding Ireland announcement on regulations on short term lettings \(2018\)](https://rebuildingireland.ie/news/minister-murphy-announces-regulations-for-short-term-lettings/) <https://rebuildingireland.ie/news/minister-murphy-announces-regulations-for-short-term-lettings/>; New Short-Term Letting Regulations, Planning and Development (amendment) Regulations 2019. *Dublin City Council*. Accessed: <https://www.dublincity.ie/residential/planning/planning-applications/planning-enforcement/short-term-lettings>

the Irish government announced a temporary rent freeze and eviction ban,<sup>40</sup> while rising concerns over empty commercial property were met with a commercial rates waiver.<sup>41</sup> The pandemic has opened broader questions around what kinds of spaces and properties are needed in Dublin, particularly when comparing residential and commercial development trajectories in the city. At the same time that the pandemic has fuelled public debate around housing availability and quality in Dublin, co-living developments have received planning and council approval.<sup>42</sup> While these developments are not directly related to vacancy, they illustrate an evolving public debate over how urban space is used, as well as a potential change in what uses are deemed viable and/or preferable to government actors and residents alike.

In August 2020, the recently appointed Minister for Housing, Local Government and Heritage, Darragh O'Brien TD, announced €40 million **Voids Stimulus Funding** to “return of approximately 2,500 vacant local authority properties to productive use.”<sup>43</sup> By supplementing local authorities’ refurbishment costs, this investment is seen to provide a dual benefit of creating additional social housing stock while creating local employment opportunities. All together, Dublin’s four councils are due to receive nearly €10 million, of which €5.7 million is budgeted to Dublin City Council.

The pandemic has radically reshaped everyday life in the last year. As the government promotes ways of living with Covid-19 over the coming months and years,<sup>44</sup> questions remain regarding what socioeconomic recovery from the pandemic will look like. While housing, employment and place-based development are likely to feature within longer-term plans it remains unclear how urban vacancy will be framed and manifest. Provisionally, commercial vacancy seems poised to rise within political discourse, while residential vacant sites will continue be targeted as a fix for a growing housing crisis. As the government begins announcing new responses to different types of vacancy, understanding the nuances and scale of urban vacancy becomes ever more important. The Covid-19 pandemic has also raised discussions around urban residents

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<sup>40</sup> Department of the Taoiseach. (2020). Briefing on the government's response to COVID-19 - Wednesday 29 July 2020. *Government of Ireland*. Accessed: <https://www.gov.ie/en/publication/f3c5b-briefing-on-the-governments-response-to-covid-19-thursday-29-july-2020/>

<sup>41</sup> <https://www.irishtimes.com/business/commercial-property/covid-19-may-slow-dublin-office-letting-to-lowest-level-since-2012-1.4351878>; Covid Rates Waiver. (28 October 2020) *Dublin City Council*. Accessed: <https://www.dublincity.ie/news/covid-rates-waiver>

<sup>42</sup> For example, Neylon, L. (8 April 2020) Council Approves Plans for New Co-Living Complex in the Liberties. *Dublin Inquirer*. Accessed: <https://dublininquirer.com/2020/04/08/council-approves-plans-for-new-co-living-complex-in-the-liberties>

<sup>43</sup> Department of Housing, Local Government and Heritage. (2020) Minister O'Brien announces allocation of funds which will see over 2,500 vacant social housing units returned to use. *Government of Ireland*. Accessed: <https://www.gov.ie/en/press-release/17362-minister-obrien-announces-allocation-of-funds-which-will-see-over-2500-vacant-social-housing-units-returned-to-use/>

<sup>44</sup> Department of the Taoiseach. (2020) Resilience and Recovery 2020-2021: Plan for Living with COVID-19. *Government of Ireland*. Accessed: <https://www.gov.ie/en/campaigns/resilience-recovery-2020-2021-plan-for-living-with-covid-19/?referrer=http://www.gov.ie/roadmap/>

moving out to the countryside, raising questions about how this might impact residential vacancy rates in both urban and rural contexts across Ireland.

However this pandemic progresses, vacancy must also be considered in relation to intensifying concerns over climate change, environmental justice, and sustainable living. For instance, we are cognisant of Geological Survey forecasts that suggest Dublin will be significantly impacted by rising sea levels and intensifying flooding by 2100.<sup>45</sup> Likewise, if the projected increase in remote working stimulates new residential patterns whereby households leave cities for smaller towns and villages, approaches to re-using vacant housing stock will be valuable as sustainable planning tools. Furthermore, encouraging sustainable approaches to reusing vacant sites and structures could support efforts to reduce consumption and emissions within the construction sector while furthering green transitions and recoveries. While it is not the purpose of this report to speculate on future forms of vacancy, we expect vacancy to only broaden its relevance for social, economic, and environmental policy agendas in Dublin, and Ireland more generally.

## **2.5 Assessing the policy context**

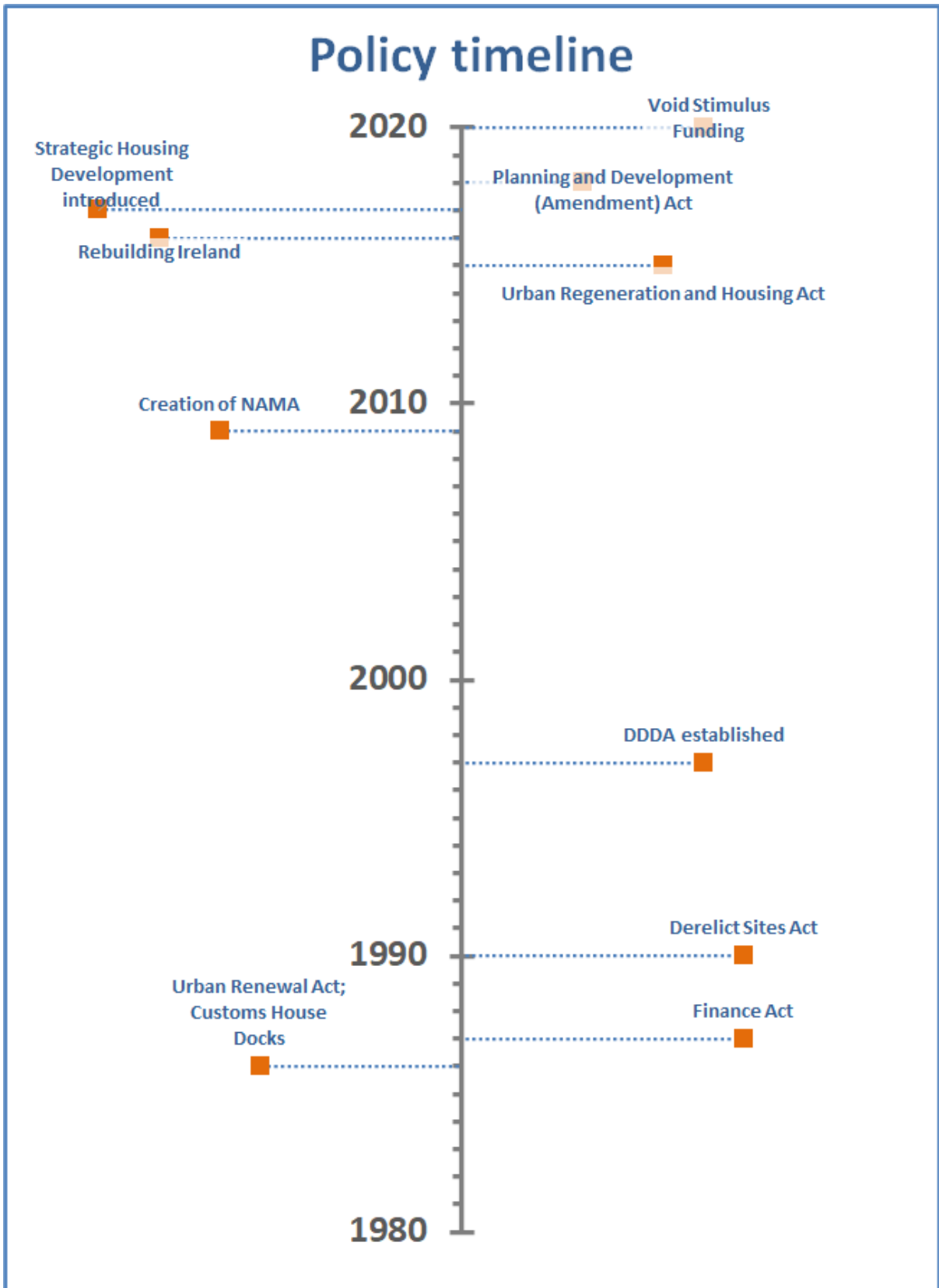
This section has examined the prevailing political framings of, and responses to, urban vacancy in Dublin. By addressing two key questions – relating to which types of vacancy policy has focused on and what specific policy measures have been put in place – a more nuanced picture of vacancy can be seen. Rather than one singular issue, approaches to addressing vacancy in Dublin can be categorised as firstly, split between market-based strategies for the large-scale transformation of brownfield land versus small-scale targeted, though more limited, interventions in specific sites, and secondly, as responding to specific forms of vacancy on the basis of pressing policy objectives and political issues of the moment.

From the 1980s, significant urban dereliction was addressed through urban regeneration schemes and the through the Derelict Sites Act. Following the property crash, the spate of unfinished residential and commercial developments were responded to through a range of policies, while also raising more fundamental questions about the causes of vacancy. In recent years there has been a shift from targeting excessive vacancy to identifying any vacant stock to be re-used for housing. There has been some movement towards the creation of a concerted approach to identifying and responding to housing vacancy, and a range of policy measures have been rolled out to this effect. Although these measures have opened a policy

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<sup>45</sup> (26 September 2019) Potential flooding areas in Dublin projected by 2100. *Geological Survey Ireland*. Accessed: <https://www.gsi.ie/en-ie/events-and-news/news/Pages/Potential-flooding-areas-in-Dublin-projected-by-2100.aspx>





dialogue on the complicated and dynamic aspects of urban vacancy, the need to engage with this complexity will become more acute within the context of the fallout of the Covid-19 pandemic.

*Timeline of key policies and legislation (Credit: Maedhbh Nic Lochlainn)*

### 3. Vacancy measures and datasets

Vacant property and land in Dublin is currently measured and analysed by national and local governments, public and private institutions, civil society organisations, and citizens alike. Measures and data vary considerably in terms of definitions, detail, reliability, and frequency. In turn, it can be difficult to integrate different information with a view to establishing a comprehensive image of vacancy in Dublin.

As part of ongoing *Rebuilding Ireland* plans (see section 2.3), the Department of Housing, Planning and Local Government has called for the establishment of robust and reliable methods to identify and track vacant property and land. This has been in recognition of the fact that, while there have been some consistent measures of vacancy in operation in Ireland, other forms of measurement have been ad-hoc and responding to acute policy problems and political concerns. This imperative has already led to the launch of a public platform for reporting vacant properties (see section 3.3) and resulted in diverse efforts to adapt, improve, and integrate existing government datasets and measures.

This section summarises existing measures for vacant land, property and housing in Dublin. The selected datasets and measures were identified through preliminary desk research of government documentation, academic and press publications, and interviews with key stakeholders. To facilitate a more comparative analysis, individual measures have been grouped into categories: national measures, local authority efforts, public mapping and crowdsourcing efforts, and adjacent data. Each measure was reviewed for the following information:

- Owner/creator
- Scale/size
- Data collection frequency (static/ongoing/other)
- Timeframe
- How vacancy is defined
- Information provided
- How data are collected
- Number of vacant sites identified

We outline each measure in greater detail below. A table summarising vacancy measures for Dublin is also available in Appendix one.

### 3.1 National measures

Vacancy is currently measured and reported at a national scale in two datasets: the Irish Census and GeoDirectory. Both measures offer static but detailed accounts of vacancy but their data collections method and vacancy definitions differ, leading to differences in reported vacancy rates.

#### ***Census Data - Vacant Dwellings/Housing in Ireland***

Census data collected by the Central Statistics Office provides a detailed but static image of household vacancy across Ireland on one evening every five years. Census vacancy rates are based on 'de facto residency' on the night of the census, taking place every five years. In turn, the vacancy rate includes dwellings that are both permanently and temporarily unoccupied.

Census enumerators gather data on vacancy by looking for typical signs of non-occupancy and may also ask neighbours. Enumerators must revisit a property several times (more than twice) to identify it as vacant, or as a holiday home (a category separate from vacant). Furthermore, the Census is particular in that the public has a legal obligation to provide information to enumerators. Collected data distinguishes between different types of dwellings (single, multi; detached, semi-detached, terraced; apartments/flats) and whether or not the dwelling is a holiday home (dwellings occasionally occupied). To be deemed vacant, dwellings must be "fit for habitation" and neither derelict nor under construction.

The 2016 Census identified 183,312 vacant houses or apartments (140,120 vacant houses and 42,192 vacant apartments). The Census also recorded an additional 62,148 holiday homes nationwide, which are not classed as vacant. According to these results, Dublin's vacancy rate excluding holiday homes totalled 6 per cent (down from 8.3 per cent in 2011).<sup>46</sup>

#### ***GeoDirectory***

GeoDirectory is a national electronic register of addresses and geographical locations set up by An Post and Ordnance Survey Ireland (OSi), which serves as the basis for a wide variety of public maps via GeoHive, a national mapping tool created by OSi. GeoDirectory collects and stores information on all residential and commercial addresses in Ireland. Knowledge of vacancy is collected from An Post workers at regular intervals and used to update GeoDirectory's dataset. In addition to selling this data, GeoDirectory publishes free public reports on residential and commercial vacancy biannually. Both reports are based on analysis of

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<sup>46</sup> Further information: Vacant Dwellings - Census of Population 2016 - Profile 1 Housing in Ireland. *Central Statistics Office*. Accessed: <https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/vac/>  
<http://census.cso.ie/P1map43/>

GeoDirectory's database. Data collection methods are not publicly specified but data underpinning both vacancy reports are available for purchase from GeoDirectory.

GeoDirectory's **Residential Building Report** provides a national snapshot of the country's residential housing stock, addressing construction, transaction, and vacancy. Data used in the analysis consists of the address point and dwelling or building type (Detached, Semi-Detached, Terraced, Duplexes, Bungalows, Temporary). Buildings under construction are also recognised, while apartments are identified as "a dwelling which exists in a building of more than five dwellings."<sup>47</sup> According to the 2020 Q2 report, 4.5 per cent of residential dwellings in Ireland were classified as vacant (91,067 of over 2 million). Dublin's residential vacancy rate was the lowest in the country (1.3 per cent), but 0.1 per cent higher than the previous year. Dereliction was considered separately in the report. Over 1.4 per cent of the country's 24,438 derelict addresses are reported to be in county Dublin.

Similarly, the **Commercial Vacancy Report** provides a national snapshot of different forms of vacancy amongst commercial properties. The dataset distinguishes between vacancy, dereliction and properties under construction. Along with address points, the dataset also collects information on the occupying business and sector for each vacant property. The most recent report (Q2 2020), reported a national commercial vacancy rate of 13.5 per cent of total stock (28,469). Dublin commercial vacancy rate stood at 12.2 per cent, up .1 per cent from Q2 2019.<sup>48</sup>

### ***VacantHomes.ie***

VacantHomes.ie is a national public platform for reporting vacant properties. Created by Mayo County Council in 2017 and updated in 2019, the website has since become nationally operational as part of the Department of Housing, Planning, and Local Government's *Rebuilding Ireland* action plan and *Vacant Homes Strategy*. With a focus on empty residential properties, members of the public are encouraged to report any houses or apartments that they consider vacant. No specific definition of vacancy is provided. Reporting is anonymous, and can include the property's address, geo-locational data, photos, and any knowledge of the owners. Reports must specify whether any of the following physical attributes are present: for rent/sale signs, overgrown grass, peeling paint, waste bins on the ground, boarded up windows, and roof damage. The

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<sup>47</sup> GeoView Residential Buildings Report, Q2 2020. *GeoDirectory*. Accessed: <https://www.geodirectory.ie/getattachment/Knowledge-Centre/Reports-Blogs/GeoView-Residential-Buildings-Report-Q2-2020/GeoDirectory-GeoView-Residential-Issue-13-2.pdf?lang=en-IE>

<sup>48</sup> Further information: (2020) GeoView Residential Buildings Report Q2 2020. *GeoDirectory*. Accessed: <https://www.geodirectory.ie/knowledge-centre/reports-blogs/geoview-residential-buildings-report-q2-2020/>; (2020) GeoView Commercial Property Report, Q2 2020. *GeoDirectory*. Accessed: [https://www.geodirectory.ie/getattachment/Knowledge-Centre/Reports-Blogs/Commercial-Vacancy-Rate-Rises-to-13-5/GeoDirectory\\_GeoView\\_Commercial\\_Issue\\_19-\(1\).pdf?lang=en-IE](https://www.geodirectory.ie/getattachment/Knowledge-Centre/Reports-Blogs/Commercial-Vacancy-Rate-Rises-to-13-5/GeoDirectory_GeoView_Commercial_Issue_19-(1).pdf?lang=en-IE); Rebuilding Ireland Map Viewer (March 2017 release). *Rebuilding Ireland*. Accessed: <https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=f975f1b5e28f4203a269bdf0e6141b50>

website reports receiving over 3000 reports since launching, which has resulted in over 300 properties nationwide being brought into reuse. While adopting a crowdsourced approach (see section 3.3), VacantHomes.ie does not provide a public map of reports or reused properties. Instead, reported properties are forwarded to the corresponding local Vacant Homes Officers for further investigation.<sup>49</sup>

### 3.2 Local efforts

In keeping with national requirements, Irish local authorities are responsible for identifying and measuring vacancy within their respective jurisdictions. Legislation requires all local authorities (LAs) to maintain separate registers of vacant and derelict sites. Both registers are regularly updated and published on an approximately monthly basis, offering consistent and timely snapshots of sites confirmed to be derelict or vacant in the city. It is important to note that these registers only include sites that have passed internal checks and legal requirements (such as being identified as vacant for at least one year).

Alongside the registers, several LAs have conducted pilot surveys to identify vacancy in recent years. Finally, while outside of Dublin, projects and research supporting town centre resilience have also helped to identify vacancy in small towns across Ireland.

#### ***Derelict Sites Register***

Following the Derelict Sites Act 1990 (section 2.1), Irish local authorities are required to maintain a register of derelict sites and properties. The Derelict Sites Register is compiled, maintained, and published by Dublin City Council (DCC), with the most recent version dated the 6<sup>th</sup> January 2021.<sup>50</sup> Members of the public can contact DCC to report possible sites for further investigation. The public register provides the site's address and file number, but no other information is included in the published register. Additional information is reportedly included within each file on the register, including owners' names and addresses, actions undertaken by the City, as well as the site's current market value. 74 derelict sites are currently included on the register. When a site has been deemed derelict, the site owner is required to pay an annual levy until the

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<sup>49</sup> Further information: Welcome to VacantHomes.ie. *VacantHomes.ie, Rebuilding Ireland & The Public Sector Magazine*. Accessed: <https://vacanthomes.ie>; CNI Editor Repots (2019) VacantHomes.ie Sees 10% Surge in Vacant Homes Registered after Christmas Appeal to Public. *Construction Network Ireland*. Accessed: <http://www.constructionnetworkireland.com/vacanthomes-ie-sees-10-surge-vacant-homes-registered-christmas-appeal-public/>

<sup>50</sup> Accessed: <https://www.dublincity.ie/sites/default/files/2021-01/derelict-sites-register-jan-6-2021.pdf>

site has been removed from the register. If the owner does not develop the property, the LA is entitled to undertake a compulsory purchase order.<sup>51</sup>

### ***Vacant Sites Register***

In keeping with requirements under the Urban Regeneration and Housing Act 2015, DCC also maintains a distinct Vacant Sites Register. To be included in the register, the site must be vacant for at least 12 months and either residential land over .05 hectares suitable for housing where there is need or regeneration land where vacancy is negatively impacting existing amenities, facilities, and public infrastructures. The register provides the site address, ownership details, folio reference, market value (and date of valuation) as well as the date the site was entered into the register.

The register is maintained and published by DCC staff, whom performed a preliminary assessment of potential sites when the register was created in January 2017. Over 700 sites were identified through this initial study. As of 2017, over 385 sites had been deemed eligible for the register out of 971 sites visited. This number is likely to have increased since. The register was most recently updated on the 23<sup>rd</sup> September 2020, and listed 54 sites.<sup>52</sup> Members of the public can also report potential vacant sites to DCC, which are then researched, inspected, and photographed by DCC. As with derelict sites, property owners of sites are charged a 3 per cent market value levy until the property ceases to be vacant.<sup>53</sup>

### ***Local Authority pilot surveys***

In response to the national mandate to understand the scale of vacancy, several LAs have piloted their own survey approaches in the hopes of creating more granular approaches to identifying vacancy in their areas. In greater Dublin, at least two local authorities have completed street survey pilots in recent years.

In 2017, Fingal County Council contracted a supplier to undertake a street survey of vacant homes. Dubbed the 'Vacant Homes Identification Project' the survey used aesthetic factors to identify potentially vacant homes, and did not include properties for sale or lease or properties under construction.<sup>54</sup> Alongside the pilot, the County Council also undertook leafleting and contacted management companies and residents associations to gather information on known vacant homes.

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<sup>51</sup> Further information: (2021) Derelict Sites Register. *Dublin City Council*. Accessed: <https://www.dublincity.ie/residential/planning/active-land-management/derelict-sites>; (2019) Derelict sites. *Citizens Information*. Accessed: [https://www.citizensinformation.ie/en/environment/planning\\_and\\_development\\_in\\_ireland/derelict\\_sites.html](https://www.citizensinformation.ie/en/environment/planning_and_development_in_ireland/derelict_sites.html)

<sup>52</sup> Accessed: <https://www.dublincity.ie/sites/default/files/2020-12/vacantsitesregister.pdf>

<sup>53</sup> Further information: (2021) Vacant Sites. *Dublin City Council*. Accessed: <http://www.dublincity.ie/main-menu-services-planning/vacant-sites>

<sup>54</sup> Department of Housing, Planning and Local Government (2017) Planning Circular Letter Circular PL 7/2017 Re: Vacant Homes Action Plans.

Likewise, DCC's Dublin Housing Observatory (DHO) piloted a street survey method for identifying vacant residential properties in autumn 2017. Taking place in four electoral districts across Rotunda, Ballybough, and Rathmines, the pilot consisted of a street survey to identify potentially vacant homes and door knocking to confirm vacancy. The survey sought to gather detailed information and geocoded data on vacancy in each area, including distinguishing between habitable and uninhabitable homes as well as short and long-term vacancy. Following the preliminary results, researchers subsequently narrowed the identified vacant sites to residential properties that were available for use. This secondary analysis resulted in only three properties being deemed appropriate for reuse, and did not contradict the 2016 CSO vacancy rates.

Complimenting the street survey's labour intensive approach to identifying vacancy, DHO researchers also trialled a predictive approach to identifying potential indicators of long term vacancy, by analysing electoral district level housing data in Dublin. The trial analysed the relation between home ownership, age, and vacancy rates. Along with finding some correlations, the trial suggested that machine learning models could be used to identify vacancy indicators. Insights from this pilot were shared with the Department of Housing.

Building on these efforts, the Department of Housing have supported several LAs to trial similar approaches designed to specifically identify vacant houses that can be brought back into use for social housing. Houses were reportedly prioritised, as apartments were more difficult to identify using the survey approach. Partnering LAs included Wexford City, Cork City, and Dún Laoghaire-Rathdown County Councils.

### ***Town Centre Health Check***

While not specifically addressing urban vacancy in Dublin, efforts have also been underway to gather information on residential and commercial vacancy in towns across Ireland. One particularly comprehensive example is the Town Centre Health Check (TCHC). Instigated in 2016 by the Alison Harvey, Heritage Council, and collaborators, the TCHC has sought to provide a method for mapping and establishing land use, floor space, vacancy rates, building conditions, and ownership in town centres, alongside additional surveys and audits.<sup>55</sup> Unlike other vacant measures, this approach demonstrates a more place-based approach to understanding and responding to vacancy, in support of local regeneration and development efforts. Indeed, the TCHC approach collects data through a standardized 15-step process, in order to create baselines for measuring impact and changes.

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<sup>55</sup> Harvey, A. (12 June 2020) Ireland's Collaborative Town Centre Health Check Programme: Why and How?! *DCHG & RIAI Webinar*. Accessed: <https://www.heritagecouncil.ie/content/files/Irelands-Collaborative-Town-Centre-Health-Check-Programme-Why-and-How.pdf>

### **3.3 Crowdsourcing and public maps**

Alongside governmental efforts to identify and document vacant land and property, a number of civic institutions, independent researchers, and ad hoc collectives have instigated mapping efforts to identify and illustrate urban vacancy in Dublin. These websites and maps are frequently disseminated through social media and news articles to highlight the prevalence of vacant or derelict land and property in Dublin and to encourage the public to identify and report such spaces.

Along with raising public interest, public mapping and crowdsourcing can compliment and inform other vacancy measures. In theory, relying on public reporting offers continuous and up-to-date information on potentially vacant sites, which compliment the more detailed but static snapshots provided by national datasets. Nevertheless, voluntary and crowdsourced approaches to reporting can have uneven response rates and inaccurate results.

#### ***Reusing Dublin***

Reusing Dublin is a crowdsourcing platform for vacant homes in Dublin created by Space Engagers, a social enterprise research collective, in collaboration with the Peter McVerry Trust, a national housing and homelessness charity.<sup>56</sup> Both a map and an app, the platform is reported to have operated from 2017 to 2019, with a public launch reported in March 2018. Combining crowdsourced reporting with public mapping, people can report a potentially vacant site through the platform where it is publically mapped. When reporting a vacant site or home, users select the relevant categories (site or building; vacant, partially used, or derelict) and provide a brief description, hashtags, and associated media (such as photographs). Upon receiving this information, the Peter McVerry Trust undertakes its own research on the property and attempts to contact the owner. As of January 2020, Reusing Dublin had received over 267 reports (244 buildings, 23 sites) with the most recent reported in March 2019.

#### ***Vacant and derelict sites Google Map by University of Maynooth PhD students***

Featured in a 2013 *TheJournal.ie* article, this crowdsourced map sought to capture a variety of vacant sites across Dublin. PhD students Eoin O'Mahony and Stephen Rigney worked with approximately a dozen collaborators to collect data by identifying properties using geo-tagged photographs or through prior knowledge. No particular definition of vacancy was provided or referenced. However, the map distinguishes between several different types of vacant and derelict sites, including: boarded up houses, closed commercial properties, closed institutional or publically owned properties. At present, over 250 vacant sites

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<sup>56</sup> Further information: *Reusing Dublin*. Accessed: <https://www.reusingdublin.ie/#how>



and properties have been listed. Properties from the DCC derelict properties list are also included. While the map was created in 2013, it is unclear when data collection stopped.<sup>57</sup>

### **Dublin Inquirer Vacant Sites Map**

In December 2016, the *Dublin inquirer* published a vacant sites map created by journalist Simon Auffret and collaborators. Following Dublin City Council's February 2015 audit of vacant sites, the map distinguishes between three categories of vacant sites: between vacant land, vacant land and buildings, and vacant buildings. In all cases, vacancy is equated with some combination of cleared sites as well as empty and/or dilapidated buildings. The map provides the address, last known owner, date of record, source, and category for each identified vacant site. Over 389 sites are recorded on the map, however its creators note that it is not exhaustive given the absence of some Dublin City Council sites.

The map was created by integrating several data sources that span 2015-17, including: a February 2015 DCC audit, LandDirect land registry records, the Derelict Sites Register, reports from DCC's local area committee meetings and Dublin City Architects, as well as queries to government departments and officials, public bodies, and planning applications. When the map was initially published on the 7<sup>th</sup> December 2016, the owners reported their intention to update; however it is unclear when, and indeed if, this has occurred.<sup>58</sup>

### **3.4 Adjacent/secondary datasets**

In addition to explicit measures and datasets, a number of adjacent datasets can act as proxy indicators or provide supplementary information on vacancy. The databases and datasets outlined below are indicative rather than exhaustive.

In the first instance, some datasets related to housing markets, planning permission, and specific types of properties (e.g. STLs) could be used as proximate measures to indicate specific sites or areas with a greater likelihood of vacancy. Secondly, a variety of datasets, databases, and information sources can be used to gather additional information on sites and properties identified as potentially vacant. For instance, gathering information on ownership, valuation, as well as zoning and planning can provide a more nuanced

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<sup>57</sup> Further information: Barry, A. (30 June 2013) Derelict sites in Dublin get mapped. *The Journal.ie*. Accessed: <https://www.thejournal.ie/derelict-sites-in-dublin-get-mapped-969180-Jun2013/>; O'Mahony, E., Rigney, S. and collaborators (2016) Dereliction in Dublin (Dereliction Map – updated continuously). *Google My Maps*. Accessed: <https://www.google.com/maps/d/viewer?msa=0&mid=1GSmBZ6hWvr1JUASWrVtSN3WDDk&ll=53.35474400704017%2C-6.275201500000094&z=11>; Barry, A. (30 June 2013) Derelict sites in Dublin get mapped. *The Journal*. Accessed: <https://www.thejournal.ie/derelict-sites-in-dublin-get-mapped-969180-Jun2013/>

<sup>58</sup> Further information: Kavanagh, C. (13 July 2016) Should it Be Easier to Find Out Who Owns a Property? *Dublin Inquirer*. Accessed: <https://www.dublininquirer.com/2016/07/13/should-it-be-easier-to-find-out-who-owns-a-property>

understanding of vacancy. While some efforts have been undertaken to collate datasets and collate information, they are presently far from systematic or effortless.

### ***Proximate measures***

From empty sites to incomplete developments to unoccupied properties, urban vacancy can mean many things. As seen above, some datasets explicitly focus on seeking out vacant sites and properties through door-to-door surveying, assessing visual signs, or checking with neighbours. However, certain types of vacancy are not easily measured, particularly when considering individual dwellings within larger buildings. In such cases, proximate measures can help to identify specific kinds of sites and spaces.

For instance, the website **Inside Airbnb** presents and categorises Airbnb property listings from different cities to encourage public discussion.<sup>59</sup> The website is managed by Murray Cox, an independent activist and technologist, who collects data at regular intervals by scraping and analysing publically available information from Airbnb's website. In addition to reporting the approximate location and number of listings data is also available on room types, property prices and income, availability, and hosts. The website defines vacancy as any period a listing is not occupied.

Inside Airbnb's most recent analysis of Dublin took place on the 26<sup>th</sup> November 2019, reporting 9,437 total listings (4,663 entire homes/apartments; 4,498 private rooms; 161 shared rooms) and estimating that entire homes/apartments are rented an average of 109 nights per year. These findings can be further considered alongside the number of properties affiliated with individual hosts, and the average prices and estimated incomes of each property. Inside Airbnb is not alone. Government actors, activists, and interested individuals have all demonstrated an interest in understanding how systematic digital scrapes could provide more details on STLs and housing in Dublin more generally, indicating that digital scrapped data could be further tested and integrated into vacancy measurement approaches.

While Inside Airbnb provides information on a particular platform and proxy for STL vacancy, it could be possible to collect data on other forms of vacancy using digital scraping methods. For instance, could such information be gathered by interrogating the duration of vacancy from different housing and rental market websites, such as **DAFT.ie**. If so, attention could be paid to properties ready for move it that have been available for a longer than average period. Indeed, during the first phase of the Covid-19 pandemic, the

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<sup>59</sup> Dublin. Inside Airbnb: Adding data to the debate. Accessed: <http://insideairbnb.com/dublin/>

sudden rise of rental properties listed on DAFT.ie was publicly discussed as a potential proxy for recent STLs in Dublin.<sup>60</sup>

### ***Additional information for vacant sites***

Already, many measures and datasets are cross-referenced with supplementary datasets to develop a more detailed understanding of particular vacant sites and properties. For example, when a potential vacant site is reported, the local authority will endeavour to determine its market value and identify its legal owner. Ownership and title information, and any associated burdens or charges (such as mortgages), might be accessed through the Property Registration Authority's **Land Registry Services** or the **Registry of Deeds**. Equally, zoning information and planning applications are publicly available through Department of Housing, Planning and Local Government's MyPlan.ie map viewer. This service was also used as the basis for the Rebuilding Ireland web map.

While some information sources are already used and publicly accessible, it is worthwhile reflecting on the interoperability, availability, and usability of supplementary information sources more generally.<sup>61</sup>

## **3.5 Assessing Dublin's measures**

Having outlined the individual measures and data related to urban vacancy in Dublin, this section assesses their commonalities and differences and how they relate to one another and the broader policy context discussed above (see Section 2). While there are a number of measures related to urban vacancy in Dublin, we find that differing definitions and reasons for measurement have resulted in uneven reporting, unclear parameters, and clear gaps in information. Overall, certain types of vacancy are more readily identified and measured than others, due to feasibility and political priorities. We present our assessment in further detail below.

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<sup>60</sup> Quinlan, R. (25 March 2020) Coronavirus effect prompts five-year high of homes for rent in central Dublin. *The Irish Times*. Accessed: <https://www.irishtimes.com/life-and-style/homes-and-property/coronavirus-effect-prompts-five-year-high-of-homes-for-rent-in-central-dublin-1.4211087>; Cantillon (22 August 2020) Pandemic reveals impact of Airbnb on Irish rental market. *The Irish Times*. Accessed: <https://www.irishtimes.com/business/economy/pandemic-reveals-impact-of-airbnb-on-irish-rental-market-1.4335784>

<sup>61</sup> Further information: Landdirect.ie. *Property Registration Authority*. Accessed: <https://www.landdirect.ie/>; Myplan.ie. *Department of Housing, Local Government and Heritage*. Accessed: <https://myplan.ie/>; Rebuilding Ireland Map Viewer (March 2017 release). *Rebuilding Ireland*. Accessed: <https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=f975f1b5e28f4203a269bdf0e6141b50>

### ***Varied definitions and parameters***

Vacancy measures largely focus on long-term vacancy and rely on a combination of aesthetic indicators (e.g. broken windows, overgrown gardens) and local knowledge (e.g. door knocking, neighbour information) to identify potentially vacant sites and properties. Despite this, the measures and data we have reviewed are based on a variety of implicit and explicit understandings of vacancy. For instance, the lack of distinction means that different measures implicitly conflate different scales and types of vacancy. For instance, the Vacant and Derelict Sites Registers focus on identifying different types of vacant sites, while Census data captures vacancy at the dwelling, rather than property level. Furthermore, most measures use different qualifications to determine a potentially vacant site or property, ranging from physical attributes (such as poorly kept gardens or a lack of furniture) to verbal confirmation from neighbours.

While varying indicators and measures are important and useful, they create significant challenges for integrating different measures and ensuring certain kinds of vacancy are not absent or overlooked. A definition for vacancy need not be singular, but should provide a clear and common account of all prevailing types of vacancy and their associated indicators. A more nuanced but overarching common framing could allow for more targeted approaches for identifying vacancy. We address this further in the recommendations.

### ***Capability and feasibility***

A number of efforts are underway to identify and measure vacancy in Dublin, incorporating a mix of static and ongoing measures, different data collection approaches, and types of information. Our review of existing measures suggests all measurement approaches make trade-offs in terms of the level of detail, frequency, and scale. For instance, the Census and GeoDirectory provide national snapshots of vacancy at longer intervals, compared to local authority's monthly updates of Vacant and Derelict Sites Registers, or local crowdsourced efforts which provide detailed insights intermittently or intensively over a short time period. Likewise, different types of vacancy appear easier to identify based on street level observational data collection methods, which currently dominate measurement approaches. Specifically, individual sites and residential properties accessible by street area seem to be more popular targets for measurement than units off street level, dwellings within larger complexes, and commercial vacancy.

Measurement approaches and data collection require dedicated time, work, and other resources and expertise to be successfully designed and integrated. For instance, DCC designed and piloted a street survey method for identifying residential vacancy in four electoral districts in Dublin, but this was considerably time and labour intensive. Without dedicated support and resources, new approaches to measurement may be

short-lived for government officials tasked with monitoring and addressing vacancy. For example, Mayo County Council's VacantHomes.ie crowdsourcing platform has now been rolled out nationally with support from counterparts in the Department of Housing Department. To address these gaps, alternative approaches to measurement may need to be tested and rolled out in cooperation with national government and non-governmental actors.

### ***Integrating information***

Efforts to link different vacant measures and datasets remain somewhat limited, residing mainly when a vacant site or property is reported. For example, VacantHomes.ie sends reported vacancies directly to Vacant Homes Officers. There is some indication of information sharing between Vacant Homes Officers and national counterparts, but no integrated dataset or database is publicly available. One exception is GeoHive, which has served as an important platform for where data on Census vacancy rates, planning, property markets, and demographic profiles can be analysed in productive ways. Recognising these efforts, we can envisage opportunities for more standardised, responsive, and visible integration of vacancy data.

Once a site, property or dwelling is deemed potentially vacant, additional information is needed to confirm this status and determine the best course of action. Presently, some measures draw upon (and publish) complementary information related to property registration and/or ownership, property valuation, and planning permissions. However, there appears to be considerable scope to integrate this information into all measures, and to seek out additional information sources that might assist in verifying or even predicting vacancy. For instance, a report published by the Housing Agency highlighted how other countries draw upon electricity or council tax data in relation to housing vacancy.<sup>62</sup>

Finally, while existing measures are rightly focused on identifying vacancy, it remains unclear how current vacancy data and measurement informs policy decisions and the wider framing of vacancy. Devising policy solutions for something that is only partially understood is a challenging position from which to start. This issue is beyond the scope of this report, however we believe it is important to note as a point for further consideration in our subsequent report. Going forward, it would be useful to understand what existing data has most relevance to policy makers and the public alike, and what information would be useful in future.

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<sup>62</sup> Crowe, P. (March 2019) How data on vacancy is created and used: Case studies from Scotland, Denmark and Philadelphia. *Housing Agency*. Accessed: [https://www.housingagency.ie/sites/default/files/publications/190324%20NHA%20Vacancy%20Research%20FINAL\\_.pdf](https://www.housingagency.ie/sites/default/files/publications/190324%20NHA%20Vacancy%20Research%20FINAL_.pdf)

## 4. Preliminary recommendations

This section offers five preliminary recommendations for improving current governmental efforts and approaches to identifying, measuring and, to a lesser extent, responding to urban vacancy in Dublin, and Ireland more generally. The first two attend to how vacancy is framed and defined. The two subsequent recommendations focus on the mechanics and logistics of data collection and measurement, while the final recommendation reflects on political responses to urban vacancy more generally.

### ***> Reframe vacancy as integral and nuanced, rather than inherently problematic***

Vacancy is neither uniform nor singular, and has always existed within cities. However, recent political responses have predominantly framed vacancy as a problem to be solved – particularly through redevelopment or occupancy. This narrative is unhelpful and does not capture the full, and often much more complicated, reality of vacancy. **We recommend moving towards a more holistic perspective of vacancy to be promoted by all spheres of government.** Such a perspective does not discount that vacant sites, properties and dwellings can, at times, be efficiently directed towards Ireland’s broader housing crisis or associated challenges. However, it also recognises that vacancy emerges through a variety of processes, takes many different forms, and can be responded to in a host of manners (if at all). To broaden political interest to urban vacancy, a wide coalition of perspectives need to be gathered. For instance, while urban vacancy is frequently upheld as the inherent domain of housing and regenerations policies, other political areas (e.g. heritage and conservation, urban development, and ecosystems) interact with and respond to vacancy.

### ***> Establish clearer, more granular definitions of vacancy***

Vacancy is far from a singular status, but an amorphous term encompassing varying conditions and fluctuating boundaries. Amidst the current housing crisis, some measures and policies focus on vacant dwellings, while others also consider vacant land and sites. Equally, parallel policies and legislation surrounding vacancy and dereliction can lead to uncertainties, overlaps, or omissions.

**Instead of simply labelling a site or property as vacant, a detailed typology of vacancy is needed, along with dedicated strategies for identifying and responding to each type of vacancy.** Such a typology should be based on a careful analysis of existing measures and data and provide clearer specifications which distinguish between different types of vacancy. For instance, existing data on vacancy type (dwelling,

building, site), condition (habitable, minor repairs needed, substantial repairs needed, derelict/rebuild required), owner (e.g. individual, commercial, government agency, civic/religious institution), and land use and zoning category could be analysed to identify of prevailing types of vacancy. Factors such as geographical location and short versus long-term vacancy will also be significant in identifying appropriate policy responses. In support of this recommendation, we have devised a provisional typology of urban vacancy in Dublin (Appendix two). We hope this typology can serve as a starting point for more sustained efforts to identify and distinguish between different types of urban vacancy in Ireland.

### **> Integrate existing urban vacancy measures**

From local registers to Census data to crowdsourced mapping, this report has outlined a variety of data, measures, and approaches to identifying urban vacancy within Dublin. While some datasets are accessed or incorporated to gather additional information (see section 3.4 for adjacent datasets), our analysis suggests that a more complete and consistent integration of identification and measurement efforts has yet to occur.

To eliminate replicated efforts and increase the range and quality of information gathered, **existing vacancy measures and datasets should be systematically integrated and made readily available to policymakers and the public alike.** Integration should seek to ensure static measures (such as the Census) and ongoing datasets (such as registers and maps) can be cross-referenced to ensuring consistent and thorough information, while remaining up to date. Vacant Housing Units at the national and local scale should collectively establish a central repository for vacancy data, along with reporting requirements, and data collection protocols. Once integrated, data could be made publicly available for download in accordance with Ireland's Open Data Strategy and Public Sector Data Strategy,<sup>63</sup> and visualised through GeoHive.

### **> Test novel measurement approaches**

Data integration is important but does not address blind spots within existing vacancy measures. Certain types of urban vacancy can be harder to identify, such as individual dwellings within larger properties. Equally, detailed or robust data might only be collected sporadically and benefit from more frequent updates. For example, Census enumerators record individual dwellings as vacant after several visits, but such information is only gathered every five years.

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<sup>63</sup> Government Reform Unit, Department of Public Expenditure and Reform (2017) Open Data Strategy 2017-2022. *Data.gov.ie*. Accessed: [https://data.gov.ie/sites/default/files/files/Final%20Strategy%20online%20version\(1\).pdf](https://data.gov.ie/sites/default/files/files/Final%20Strategy%20online%20version(1).pdf); Department of Public Expenditure and Reform (2018) Public Service Data Strategy 2019-2023. *Government of Ireland*. Accessed: <https://www.gov.ie/en/publication/1d6bc7-public-service-data-strategy-2019-2023/>

**Novel information sources and approaches to data collection could help policymakers develop a more reliable and comprehensive snapshot of urban vacancy.** While street-level surveys of vacancy can provide additional insight, this approach can be costly and time consuming. For instance, crowdsourcing (e.g. VacantHomes.ie and Reusing Dublin) and data mining (e.g. Inside Airbnb) are two novel methods which have been used to gather additional information on vacant properties. While promising, it is important to test such approaches to ensure they yield up to date and accurate information. Specifically, studies should evaluate how novel data collection approaches perform over time and how such methods compliment (and, ideally, supplement) existing local authority efforts.

**> *Greater transparency over how urban vacancy is addressed***

Along with mandating local Vacant Housing Officers and vacancy levies, the National Vacant Housing Reuse Strategy set out schemes for repairing and leasing as well as buying and renewing properties – including the recently announced Voids Stimulus funding. These imperatives indicate a commitment to bringing vacant sites and property into use, but do not recognise the additional capabilities required by different spheres of government and other societal actors. Collecting more detailed and robust information on vacancy must lead to improved policy responses and governmental action on vacancy. As a final recommendation, the **Department of Housing, Planning and Local Government could work with LAs to produce an inventory of actors and capabilities (e.g. time, skills and finances) needed to identify and address reported vacant sites.** A clearer understanding of this process would encourage greater accountability for different aspects of urban vacancy, while also ensuring different actors are able to fulfil their responsibilities.



## **6. Conclusion and next steps**

As the first output of the Rethinking Urban Vacancy research project, this report has outlined how urban vacancy in Dublin has been politically framed, measured, and responded to. While our findings highlight that considerable efforts have been taken to identify and address vacancy in Irish cities, considerable room for improvement remains. Ultimately our analysis and recommendations call for more nuanced, responsive, and place-based approaches engaging with urban vacancy in all of its material and temporal forms. We hope these preliminary findings are both informative and insightful, and can serve as a basis for further engagement with government officials and relevant stakeholders tasked with identifying and addressing vacancy in their respective locales.

This report will be closely followed by a second report expanding on the diverse forms and processes of urban vacancy in Dublin and other Irish cities, along with stakeholders' experiences devising and implementing measurement approaches and policy responses more broadly. The research team will also host a public workshop at the end of this project, to encourage reflection and facilitate discussion around how urban vacancy might be more productively rethought in Ireland, and beyond.

## Appendix one: Summary table of vacancy measures for Dublin

Categories	National			Local			
Measure	Census data	GeoDirectory – Geoview Reports	VacantHomes.ie	Derelict Sites Register	Vacant Sites Register	LA pilot surveys	
Owner/creator	CSO	An Post & Ordnance Survey Ireland	Mayo County Council –Dept. of Housing, Planning, and Local Gov	Local authorities	Local authorities	Fingal County Council	Dublin Housing Observatory, DCC
Collection frequency	Static but recurring	Ongoing	Ongoing	Ongoing	Ongoing	Static	Static
Timeframe	Every five years, most recently 2016	Regular intervals, reports updated bi-annually	2017-	1990- Approx. monthly updates	2015- Approx. monthly updates	2017	Autumn 2017
Vacancy definition	Fit for habitation, neither derelict nor under construction	Distinction between residential & commercial; vacant, derelict, and under construction	No specific definition of vacancy, focus on residential property or dwellings	Per Derelict Sites Act 1990	Per Urban Regeneration and Housing Act 2015 - >0.5 ha., vacant for at least 12 months	Not specifically defined, but focused on vacant homes	Not specifically defined, but focused on vacant homes
Information provided	Type of dwelling, type of non-occupancy (holiday homes as separate category)	Commercial and residential vacancy rates, building type by address point.	Does not publicly report or map properties.	Site's address and file number	Site address, ownership details, folio reference, market value (and date of valuation) and date the site was entered into the register		Narrowed focus from identified vacant sites/properties to residential properties/units available for use
Data collection	Census enumerators	An Post workers	Crowd-sourced information, forwarded to corresponding VHOs.	Local authorities required to maintain – public can report sites for investigation	Local authorities required to maintain	Street survey – aesthetic indicators, didn't include properties for sale, lease, or under construction	Street survey – aesthetic indicators and door-knocking

Categories	Crowd-sourced or public mapping			Adjacent/secondary datasets - indicative	
Measure	Reusing Dublin	Vacant and derelict sites Google Map	Dublin Inquirer Vacant Sites Map	Inside Airbnb	Daft.ie
Owner/creator	Space Engagers and Peter McVerry Trust	Maynooth University PhD students	Dublin Inquirer – Simon Affrue & collaborators	Murray Cox	Private scraping of property-listings site
Collection frequency	Other – crowd-sourced	Other – crowd-sourced	Other	Ongoing	Ongoing
Timeframe	2017-2019	2013 on, unclear when data collection stopped	2015-'17, unclear when and if updated	2016-, varying timeframes between scrapes	2018-
Vacancy definition	User-submitted – vacant, partially used, or derelict	No particular definition is given	Some combination of cleared sites as well as empty and/or dilapidated buildings	Airbnb listings – vacancy related to occupation	No definition of vacancy
Information provided	Users select relevant categories (site or building; vacant, partially used, or derelict) and provide a brief description, hashtags, and associated media (such as photographs).	Distinguishes between several different types of vacant and derelict sites, including: boarded up houses, closed commercial properties, closed institutional or publicly-owned properties	The site address, last known owner, date of record, source, and category for each identified vacant site	Publicly available information from Airbnb's website. In addition to reporting the approximate location and number of listings data is also available on room types, property prices and income, availability, and hosts	Daft.ie property listings data – short-term lets and property movement
Data collection	Crowd-sourcing user- submitted (app/web) mapping.	Crowd-sourcing user- submitted geo-tagged photos or sites	Integrating data sources that span 2015-17, as well as queries to government departments and officials, public bodies, and planning applications	Publicly published data harvested from Airbnb Dublin website	Street survey – Vacant Homes Identification Project; Aesthetic factors – did not include properties for sale, lease, or under construction

(Credit: Maedhbh Nic Lochlainn)

## **Appendix two: Towards a typology for urban vacancy**

While vacancy has taken up considerable energy within political strategies, national legislation, and public discourse, our research has indicated that a collective understanding of what constitutes urban vacancy is far from evident. On the one hand, there is no singular definition of vacancy in Ireland, although most officials and stakeholders tend to specify long-term vacancy status can only be attributed after 12 months. At the same time, there are parameters and conditions which separate efforts surrounding vacancy, or privilege certain types over others. For instance, many efforts to identify vacancy are only interested in identifying dwellings which can easily be rendered habitable with minimal cost. While other sites and spaces might be identified in early stages of research, they are quickly left or disregarded if they cannot fulfil this objective.

We contend that a single definition is neither sufficient nor appropriate for understanding or interacting with vacancy. It is important to interrogate the commonalities and particularities of vacant urban spaces, as well as the particular spatial, economic, political, ecological and social dynamics that contribute to their production. For this reason, we argue that a typology is a more appropriate and nuanced way of illustrating urban vacancy, in its myriad forms. The following sections briefly outline how a typology can be used and its underpinning information, before introducing a provisional typology for urban vacancy in Dublin.

### ***A typology for what?***

A typology is also not permanent or predictive. Rather, it can help to illustrate current forms of vacancy within Dublin, and Irish cities more generally. If vacancy is not a problem to be solved, but a state to be understood, interrogated and responded, a typology can help to add nuance and reflect the diversity of spaces, processes, and politics surrounding vacancy, while clarifying prevalent trends and possible responses.

This typology has been devised for government actors, activists, and other groups and individuals concerned with vacancy. For all audiences, it is first and foremost intended to raise awareness of the diverse and nuanced nature of vacancy, thereby also disrupting simplistic definitions or partial accounts. Though this, we furthermore hope this typology will inform ongoing governmental efforts to define, measure, and classify vacancy.

Specifically, this typology could serve as the basis for reviews of existing data collection efforts and political responses to vacancy. In particular, we hope this typology raises several questions for politicians and government officials at the local and national scale:

- Are current measurement and data collection efforts accounting for all forms of vacancy?
- How and why have particular types of vacancy become prevalent?
- What types of vacancy do current political responses address?

To remain useful, the typology needs to be updated regularly to reflect both changes in the prevalence/form and to account for new or emerging types of vacancy in Dublin and Ireland more generally. Over time, an up-to-date and responsive typology can serve as the basis for tailoring policy responses.

***What can, or should, a typology show us?***

To establish a clearer sense of vacancy in Dublin, we have indicated information that should be gathered for different types of vacancy, even if not presently publically available. In particular, a typology should be address and incorporate the following information:

- Type of space - sites, building, individual unit/dwelling
- Condition of site/property
- Duration of vacancy
- Previous uses
- Current uses
- Proposed/possible future uses
- Ownership - scale/subtypes
- Heritage status
- Planning restrictions
- Ecology /environmental impact
- Amenities
- Place

The following table outlines our proposed typology, which has been devised following a review of existing measures and datasets, in addition to interviews with stakeholders involved in creating, executing, maintaining, and using such information for governmental purposes.

In the case of urban vacancy in Dublin, some types of vacancy are more readily identifiable than others. A typology cannot solve these shortcomings, but it can highlight how existing measures and data relate to each type and identify additional or complimentary data would be useful. By devising a typology that speaks across different forms of qualitative and quantitative data and information gaps, a typology becomes illustrative rather than prescriptive. As further information becomes available, this provisional typology should be regularly updated and expanded to remain a useful reference point for policymakers and the public alike.

## Provisional Typology of Urban Vacancy for Dublin

Type	Description	Associated data/measure	Policy responses	Follow-on questions
Voids	<p>Local authority or owned residential units which are uninhabited and in need of refurbishment.</p> <p>This category could also be extended to include AHB units in a similar condition and status.</p>	<p>No public list of all voids; presumed internal LA tracking.</p> <p>January 2021 DCC Housing Supply Report reports 837 completed Void refurbishments as of December 2020: 630 Vacant Council Properties, and 207 Acquisitions.<sup>64</sup></p> <p>Census &amp; GeoDirectory – reported as residential, if identified; potentially listed as derelict, depending on condition and duration of vacancy. National Oversight and Audit Commission (NOAC) reports as possible supplementary source.</p> <p>No single public dataset for AHBs; presume each holds data on vacant units in need of refurbishment.</p>	<p>July 2020: national Voids Stimulus Programme announced (€40 million) to provide funding to LAs for refurbishment.</p>	<p>Duration of vacant status – how long must a void be uninhabited to be deemed short/long term vacant?</p> <p>How many/what types of void units, as a proportion of total LA housing stock, and in terms of geographical distribution?</p> <p>What is the average cost of refurbishment, and what barriers are faced to accelerating refurbishment and reuse?</p>
Short-term lets (STLs)	<p>Individual dwellings or properties that are rented through short term letting platforms.</p> <p>While not long-term vacant,</p>	<p>Census &amp; GeoDirectory – likely incomplete; reported as residential, if identified.</p> <p>Inside Airbnb (4,663 entire homes at of September 2020)<sup>65</sup> and equivalent web</p>	<p>Residential Tenancies (Amendment) Act 2019, set regulation on STLs in “rent pressure zones” which include all four Dublin LAs.</p> <p>If renting for more than 90 days</p>	<p>How to gather reliable data from platforms and/or enforce registration requirements for STLs?</p>

<sup>64</sup> <https://councilmeetings.dublincity.ie/mgConvert2PDF.aspx?ID=30657>

<sup>65</sup> Dublin. Inside Airbnb: Adding data to the debate. Accessed: <http://insideairbnb.com/dublin/>

	STLs may nevertheless remove housing units from long-term rental market.	scraping approaches provide estimated snapshots (see section 3.4).  Registration from Residential Tenancies Board; however, likely incomplete and not publicly available.  Long term rental listings (e.g. DAFT.ie) as proxy measure during Covid-19 pandemic.	annually, planning permission is required. <sup>66</sup> Suggestion that oversight of this is difficult to maintain, meaning limited compliance and incomplete record of total STLs in Dublin.	Should STLs be prohibited, limited, and/or taxed to support housing provision?
Vacant units over shops	Unused units or space on the upper floor of retail or commercial property, which is used for, or could be converted into, residential use.  Could be further distinguished according to where units are located, including zoning, and place, and/or surrounding housing needs.	GeoDirectory - potentially incomplete, could be remarked as commercial or residential depending on prior occupancy.  No public number. Estimates without clear statistical basis suggested between 4-6,000 in Dublin circa 2017. <sup>67</sup>  Partial reporting on Vacant Sites Register and identified in 2017 DCC pilot street surveys and data analysis. Unsure whether possible to extrapolate with Census data.	Planning and Development (Amendment) (No. 2) Regulations 2018 provide exemption on planning permission for changing commercial space over shops to residential use. Exemption temporary until December 2021. <sup>68</sup>	Average condition and cost of converting to residential use? Availability of such premises for purchase?  How to identify sites as potentially vacant – what lessons from DHO pilot survey and others?

<sup>66</sup> (2019) New Regulation of Short-Term Lettings, FAQs. *Rebuilding Ireland*. Accessed: [http://rebuildingireland.ie/wp-content/uploads/2019/06/short-term\\_lettings\\_faqs.pdf](http://rebuildingireland.ie/wp-content/uploads/2019/06/short-term_lettings_faqs.pdf)

<sup>67</sup> Neylon, L. (5 April 2017) Above Shops, Thousands of Apartments Are Still Sitting Vacant. *Dublin Inquirer*. Accessed: <https://www.dublininquirer.com/2017/04/05/above-shops-thousands-of-apartments-are-still-sitting-vacant>

<sup>68</sup> *S.I. No. 30/2018 - Planning and Development (Amendment) (No. 2) Regulations 2018*. Accessed: <http://www.irishstatutebook.ie/eli/2018/si/30/made/en/print>



<p>Vacant home (Fair Deal associated)</p>	<p>Residential dwellings or properties uninhabited due to owner entering residential care.</p>	<p>No scheme-specific public data found; however, some proportion likely captured across Census/GeoDirectory and, potentially, crowdsourced data.</p> <p>News reports in 2018 suggested that only 600 of nearly 14,000 residents in long-term care who own a property rented the uninhabited property out.<sup>69</sup></p>	<p>The Fair Deal Scheme offers an optional Nursing Home Loan where home value can be leveraged to offset care costs.</p> <p>In 2018, the Health Minister proposed financial incentives to be offered to encourage Fair Deal residents in long-term care to rent out unoccupied properties. This amendment has been welcomed, but outcome and impact of statement remains unclear.</p>	<p>Is there a dedicated list of such homes through Fair Deal scheme administration?</p> <p>How would rental income impact government home loans?</p> <p>Could restrictions on rental cost/conditions be applied?</p> <p>How to encourage higher rental rates among scheme beneficiaries?</p>
<p>Long-term vacant home (other reason)</p>	<p>Residential dwellings or properties uninhabited for more than 6-12 months, which could be brought back into residential use.</p> <p>Potential to create sub-categories to highlight prevalent or emergent types. For instance, apartments could be a distinct type, due to the difficulty in identifying them.</p>	<p>Vacancy captured across Census/GeoDirectory, local registers/surveys, and crowdsourced data exercises.</p> <p>Differing number reported for Dublin, and suggestion that certain types of vacancy (e.g. apartments) are harder to capture than others (e.g. houses).</p>	<p>Buy and Renew Scheme</p> <p>Repair and Leasing Scheme</p> <p>Vacant Sites Levy</p> <p>Compulsory Purchase Orders</p>	<p>Are certain types of homes more likely to be vacant than others?</p> <p>Do current policy mechanisms adequately address barriers to reuse and refurbishment?</p> <p>What impediments to bringing vacant housing stock back into use?</p>

<sup>69</sup> O'Regan, E. (11 September 2018) Fair Deal residents to be given bonus for renting homes under plan to ease housing crisis. *Farming Independent*. Accessed: <https://www.independent.ie/business/farming/agri-business/finance/fair-deal-residents-to-be-given-bonus-for-renting-homes-under-plan-to-ease-housing-crisis-37303728.html>

<p>Vacant short-term/corporate residential rooms</p>	<p>Vacant but habitable rooms within dedicated short-term/corporate residential properties, such as co-living and student accommodation.</p> <p>Potential to include hotel rooms within this category, if deemed relevant to vacancy definitions and policy responses.</p>	<p>Unclear whether any data is presently publically available on vacancy rates for such rooms. Potential for web scraping for availability of specific properties.</p> <p>Estimated total number of co-living units and properties collected by academics and journalists, using planning applications and associated information. Approval currently set for over 2,000 rooms in Dublin.<sup>70</sup></p> <p>Reports on student accommodation in 2019/2020 suggest planning approval for over 9,000 student accommodation rooms in Dublin.<sup>71</sup></p>	<p>Housing Minister announced restrictions on co-living in November 2020, which was passed into law in December; several developments are still in planning application process.<sup>72</sup></p> <p>Co-living and student accommodation have benefited from streamlined planning processes through the Planning and Development (Housing) and Residential Tenancies Act 2016 and Planning and Development (Strategic Housing Development) Regulations 2017.<sup>73</sup></p>	<p>When does an uninhabited room qualify as vacant?</p> <p>How much do such units cost to occupy, and what information is available on market demand?</p> <p>What is considered an appropriate use and response to vacant rooms within such properties?</p>
<p>Long-term vacant commercial/retail property</p>	<p>Commercial/retail property vacant for more than 6-12 months and in a generally habitable state, without</p>	<p>GeoDirectory – divided by sector. In Q2 2020, 13.5 per cent national commercial vacancy rate (12.2 per cent in Dublin).<sup>74</sup></p>	<p>Commercial rates waiver put in place during 2020 (see section 2.4).</p> <p>Vacant Sites Levy</p>	<p>Short and long term imperatives for maintaining such sites while vacant?</p>

<sup>70</sup> Neylon, L. (9 December 2020) How Many Co-Living Complexes Have, Maybe, Beaten the Promised Ban? Dublin Inquirer. Accessed: <https://www.dublininquirer.com/2020/12/09/how-many-co-living-complexes-have-maybe-beaten-the-promised-ban>

<sup>71</sup> O'Halloran, B. (12 June 2020). Bord Pleanála gave approval for 9,500 student bedrooms. *The Irish Times*. Accessed: <https://www.irishtimes.com/business/construction/bord-pleanala-gave-approval-for-9-500-student-bedrooms-1.4276946?mode=sample&auth-failed=1&pw-orig=https%3A%2F%2Fwww.irishtimes.com%2Fbusiness%2Fconstruction%2Fbord-pleanala-gave-approval-for-9-500-student-bedrooms-1.4276946>; (21 March 2019) Report on Purpose Built Student Accommodation in Dublin City, Report No. 112/2019. *Dublin City Council*. Accessed: <https://councilmeetings.dublincity.ie/documents/s23165/112%202019%20Student%20Accommodation%20Report%20April%20Council%20Meeting.pdf>

<sup>72</sup> (23 November 2020) Statement from Minister O'Brien on co-living. *Gov.ie*. Accessed: <https://www.gov.ie/en/press-release/c8bfc-statement-from-minister-obrien-on-co-living/>

<sup>73</sup> Strategic Housing Development Planning Applications. (2017) *An Bord Pleanála*. Accessed: <http://www.pleanala.ie/shd/general/overview/Strategic%20Housing%20Developments%20-%20Overview.pdf>

<sup>74</sup> Further information: (2020) GeoView Residential Buildings Report Q2 2020. *GeoDirectory*. Accessed: <https://www.geodirectory.ie/knowledge-centre/reports-blogs/geoview-residential-buildings-report-q2-2020>; (2020) GeoView Commercial Property Report, Q2 2020. *GeoDirectory*. Accessed: <https://www.geodirectory.ie/getattachment/Knowledge-Centre/Reports-Blogs/Commercial-Vacancy->

	substantial refurbishment or redevelopment.	Some properties likely included on Vacant and Derelict Sites Registers, and some crowdsourced maps.	Compulsory Purchase Orders	How feasible to adapt for different uses, if demand for current use declines?  How will the long-term impacts of the Covid19 pandemic change the demand for office space in city centre locations?
Vacant institutional sites/properties	Non-residential properties of previous public, social, or institutional use (e.g. schools, hospitals), which could be returned to use without substantial refurbishment or redevelopment.	Vacant & Derelict Sites Registers  Crowdsourced maps	Case by case responses, depending on particular uses/location.  Vacant & Derelict Sites Levies - although some questions over whether government is/should be subject to vacant sites levy.	How do previous uses inform the future use of vacant sites?  What recourse do public have to encourage/inform plans for reuse?  Consideration given to role as sites of memory in re-use plans?
Vacant/derelict development sites	Sites intended for redevelopment, without any intact properties or with derelict properties that cannot be brought back into use.	Vacant & Derelict Sites Registers  Crowdsourced maps  Planning applications and approvals	Urban Regeneration and Housing Act 2015 Vacant & Derelict Sites Levies  Compulsory Purchase Orders	At what point does a vacant site become solely viable for development?

[Rate-Rises-to-13-5/GeoDirectory\\_GeoView\\_Commercial\\_Issue\\_19-1.pdf?lang=en-IE](https://rate-rises-to-13-5/geodirectory_geoview_commercial_issue_19-1.pdf?lang=en-IE); Rebuilding Ireland Map Viewer (March 2017 release). *Rebuilding Ireland*. Accessed: <https://housinggov.ie/maps.arcgis.com/apps/webappviewer/index.html?id=f975f1b5e28f4203a269bdf0e6141b50>

	Distinguished at vacant due to lack of planning applications, development plans, and/or development progress over 12-month period.	could be used as a secondary measure	Living City Initiative	
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