



Comhairle Contae
Átha Cliath Theas
South Dublin County Council

South Dublin County Council Draft Traveller Accommodation Programme 2025-2029



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Introduction

The Housing (Traveller Accommodation Act, 1998) requires South Dublin County Council to prepare and adopt a 5-year Traveller Accommodation Programme to meet the existing and projected accommodation needs of members of the Travelling Community who are eligible for social housing support within the South Dublin County Council administrative area.

Directions for the preparation of a new Programme were issued on the 18th of December 2023, by the Minister for Housing of State for Planning and Local Government together with the Guidelines on the Preparation and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029.

In accordance with Section 10 of the 1998 Act, the Minister has directed that the next Traveller Accommodation Programme will cover the period from the 1st of January 2025 to the 31st of December 2029.

The Minister has specified that the latest date for the adoption of accommodation programmes is the 31st of December 2024.

Equality and Human Rights

The Council has developed a framework to implement the Public Sector Equality and Human Rights Duty under Section 42 of the Irish Human Rights and Equality Commission Act 2014. The public sector equality and human rights duty requires local authorities to undertake an assessment of the equality and human rights issues that are relevant to their functions. Membership of the Traveller Community is covered by the nine protected grounds under equality legislation. Under the Duty, we are required to take the following steps:

Assess: undertake evidence based and participative assessment of equality and human rights issues that face Travellers in respect of Traveller specific accommodation and have a relevance for the functions of the housing authority.

Address: identify and implement actions in place or proposed to be put in place by the Council to address the equality and human rights issues as assessed, as part of its strategic planning cycle.

Report: report annually on progress made in implementing the Duty and addressing the equality and human rights issues as assessed under our Equality Action Plan for Traveller specific accommodation.



County Profile

South Dublin County Council is one of four Local Authority areas in the Dublin region. Bounded by the River Liffey to the North and the Dublin Mountains to the South, the county lies 16 kilometres southwest of Dublin City Centre and has an administrative footprint of 223sq. kilometres. The County has 9 main villages Clondalkin, Lucan, Palmerstown, Rathfarnham, Tallaght, Templeogue, Saggart, Rathcoole and Newcastle and is bounded by adjoining counties of Wicklow, Kildare, Dublin City, Fingal and Dun Laoghaire.

- The population recorded in the 2022 Census for the County was 299,793.
- The number of Travellers in Ireland identified in the 2022 Census was 37,826.
- The number of Travellers identified in the 2022 Census in South Dublin County was 2098, a decrease of 110 Travellers from the 2016 Census.

According to the 2022 Census, South Dublin has the third highest Traveller population in the Dublin Region and the second highest Traveller population in the state after Galway City and County.

Local Authority	No. of Irish Travellers
Galway County Council	2820
Dublin City Council	2291
South Dublin County Council	2098
Fingal County Council	1682
Dun Laoghaire Rathdown County Council	553

Existing Traveller Accommodation

The Traveller accommodation unit conducted a survey in November 2023 and ascertained that there are currently 241 households living in Traveller specific accommodation within South Dublin County. The breakdown of this accommodation is detailed in the table below and locations are spread across the County as outlined in the associated map in the document.

Breakdown of existing Traveller Specific Accommodation

Halting/Group Housing

Location	No. Bays	Bays Occupied	No. Group Houses	Group Houses Occupied	Sharing	Unauthorised	Total
<u>Ballyowen Lane</u>	10	10	1	1	1	1*	12
Belgard Park	10	10	0	0	4	0	14
<u>Cherryfield Way</u>	9	9	1	1	2	0	12
Hazel Hill	5	3*	5	1	0	1*	4
<u>Kishogue Park</u>	10	9*	10	7*	1	2*	17
Lynch's Park	8	8*	9	8*	1	5*	17
<u>Owendoher Haven</u>	8	7	1	1	4	0	12
Stocking Hill	10	6*	0	0	0	2*	6
Old Castle Park	20	17*	0	0	3	4*	20
Total	90	79	27	19	16	15	*114

*Total of 114 Households in Bays/Group Housing

**Group Housing**

Location	No. Houses	Houses Occupied	Sharing
<u>Coldcut Crescent</u>	8	8	1
Cookstown Lane	1	1	0
<u>Daletree Place</u>	10	9	3
Mac <u>Uilliam</u> Gardens	10	10	3
<u>Greenhills Grove</u>	6	6	1
Hayden's Lane	8	8	1
Kimmage Manor Way	5	5	1
<u>Marfield</u> Crescent	5	5	0
Old Castle Drive	14	14	1
St. Aidan's Close	10	10	4
St. Mary's Close	3	3	1
Turnpike Lane	3	3	0
Tay Lane	7	7	0
Shackleton Street	7	7	0
Fonthill Close	7	7	0
Total	104	*103	*16

*119 Households in Traveller Specific Housing

Emergency /Temporary Sites

Location	Bays	Sharing
Lock Road	5	0
Whitestown Way	2	1
Total	*7	*1

*8 Households in Emergency/Temporary Sites

The Fonthill Road and Lynch's Lane Emergency sites were decommissioned under the TAP 2019-2024. Fonthill Road was replaced with a new group housing scheme and Lynch's Lane will be incorporated into the redevelopment of Kishogue Park and wider Clonburr Development.

OVERALL ASSESSMENT SUMMARY

Accommodation Type	No. of Households	Sharing	<u>Unauthorised</u>	Total
Halting Sites/Group Housing	83	16	15	114
Group Housing	103	16	0	119
Temporary Sites	7	1	0	8
Roadside	0	0	0	0
Total	193	33	15	241

REVIEW OF THE TRAVELLER ACCOMMODATION PROGRAMME 2019-2024

The Traveller Accommodation Programme 2019-2024 projected that the following accommodation would be required during the period of the programme to meet existing and projected accommodation needs including provision for new family formation and migration.

Standard Social Housing	53	62
Group Housing	30	23
Bays	25	18
Total	108	103

Casual vacancies arising within the Council's current stock of Traveller specific accommodation during the lifetime of the TAP 2019-2024 was a key element of meeting the accommodation needs of Traveller households with target of 55 such vacancies projected, during this period a combined total of 41 allocations were made in the period.

The projected need for social housing in the TAP 2019-2024 was for the provision of 53 standard social housing allocations to Travellers. From 2019-24, a total of 62 Traveller households have been allocated standard social housing. Overall, the Council achieved 95% of its projected target.



NEW TRAVELLER SPECIFIC ACCOMMODATION DELIVERED DURING THE TAP 2019-2024

- Shackleton Street, Adamstown, Lucan, Co. Dublin- Expressions of Interest were sought for an innovative group housing scheme consisting of seven new homes delivered under Part V of the Planning and Development Act 2000. Houses were allocated through a pilot Traveller Specific Choice Based Letting Scheme.
- Fonthill Close a group housing scheme consisting of 7 new homes delivered under Part V of the Planning and Development Act 2000 in 2024 to replace the temporary site on the Fonthill Road.

REFURBISHED / UPGRADED ACCOMMODATION DELIVERED DURING THE TAP 2019–2024

Location	Dwelling Type	Number of Units
Ballyowen Lane	Bay	1
Lock Road	Bay	2
Kishogue Park	1 Bay /1 Group House	2
Lynches Park	Group House	3
Belgard Park	Bay	3
Stocking Hill	Bays	4
Greenhill's Grove	Group House	1
Kimmage Manor	Group House	1
Cherryfield Way	Bays	3
Daletree Place	Group House	3
Total		23

During the period of the TAP 2019-2024, the Council spent a combined €8m on capital expenditure in respect of two new Traveller specific group housing schemes, refurbishment/relet costs and the caravan loan scheme.

ENERGY EFFICIENCY RETROFIT PROGRAMME (EERP) PILOT SCHEME

Energy poverty is widely experienced within the Traveller Community. Under the EERP, the Council afforded the opportunity to all 14 tenants in Old Castle Drive of which 9 accepted to upgrade their homes. The upgrade included the installation of air to water heat pumps and windows and doors replacement throughout the property. Attic and cavity wall insulation (where required) were also installed to bring the properties up to a BER B2 rating or cost optimal. The Council is committed to extending this pilot to provide more energy efficient housing options to Travellers in both our newly constructed homes and existing housing stock over the lifetime of the next TAP 2025-2029.

Location	No. of Units	Electoral Area	Status
Old Castle Drive	9	Clondalkin	Completed

TRAVELLER ACCOMMODATION PROGRAMME 2025 – 2029

The Housing (Traveller Accommodation Act) 1998 mandates Local Authorities to assess the accommodation needs of Travellers requiring accommodation during the programme period. Notice of this assessment was communicated to relevant statutory bodies, including members of the Housing Strategic Policy Committee, the Local Traveller Accommodation Consultative Committee (LTACC), the Irish Traveller Movement, Clondalkin and Tallaght Traveller Development Groups, and the Health Service Executive (HSE). In November 2023, a survey of Traveller households residing in the County was conducted to assess both current and projected future accommodation needs over the programme's lifespan. The assessment encompassed a range of accommodation options, including standard and group housing/halting sites. This comprehensive evaluation ensures that the accommodation provided aligns closely with the needs and preferences of the Travellers as identified through direct engagement and a consultation processes.

ASSESSMENT OF NEED

It was estimated that there are 611 Traveller households in the County, following the annual estimate of Traveller families carried out in November 2023. The participants are resident in the County in various forms of accommodation including standard housing, group housing, halting sites, temporary/emergency sites, unofficial sites, private rented and homeless/ emergency accommodation.

Accommodation Type	No. of Households
Group Housing	106
Halting Site Bay	88
Temporary/Emergency Sites	17
Sharing Accommodation	32
Standard Social Housing	166*
Approved/Voluntary Housing Body	9*
HAP/RAS/Leasing	16*
Private Rented	144*
Housing provided by own resources	33*
Total	611

*Estimated Figure



The assessment for the preparation of the TAP in February 2024 showed that there are a total of 241 families residing in Traveller specific accommodation in the County. Among these, 193 households have permanent accommodation, while 8 families are housed in temporary/emergency halting sites. Additionally, 33 families are currently sharing accommodation, and 15 families are residing unauthorised on sites. Notably, no households are living on the roadside.

Furthermore, the assessment identified that there are 93 individuals over 18 years of age living with their families in Traveller specific accommodation within family units and 30 individuals who will reach the age of 18 years of age on or before the end of 2029. This demographic profile suggests a potential need for additional 62 Traveller specific accommodation units to accommodate future family formations. It is imperative that the Council's priority remains focused on providing homes for households currently residing in emergency or shared accommodation. While acknowledging the potential need for additional units in the future, immediate attention must be given to addressing the housing needs of those Traveller households. This approach ensures that resources are allocated effectively to support those most in need within the Traveller community.

Households not included in the Housing Needs Assessment carried out in March 2024 but who are eligible for social housing support may make an application for Traveller specific housing or social housing and it will be considered in accordance with the Council's Allocations scheme.

TRAVELLER ETHNIC IDENTIFIER

The Council is committed to working with the Traveller Development Groups to improve digital access/customer services to Travellers in order to inform applicants of the option to self-identify in the social housing application form. The objective is to improve the collection and analysis of data on ethnicity that is collated in our Integrated Housing System. This anonymised statistical information can be better used to ensure accurate, robust and comprehensive data to inform decision making in relation to the provision and spending on Traveller accommodation in the County.

ASSESSMENT OF FUTURE ACCOMMODATION NEEDS

In accordance with the provisions of the Housing (Traveller Accommodation) Act 1998 and the Minister's direction, an assessment of the projected accommodation needs of Travellers arising during the duration of the programme from the 1st of January 2025 to the 31st of December 2029 has been carried out. The assessment results indicate that there is a projected demand for an additional 146 units of accommodation. These will be achieved by the construction of new Traveller specific group housing developments, refurbishment of existing vacant units, casual vacancies and standard social housing allocations.

The table below sets out a summary of the assessment of demand for Traveller Accommodation for the period 2025-2029

48	Households in shared/temporary/ <u>unauthorised</u> sites
63	Households on homeless/standard social housing list
35	Households on <u>Traveller</u> specific housing list
146	Gross total requirement
-63	Less those opting for standard social housing
83	Net provision for <u>Traveller</u> specific accommodation

Please note: this figure does not include 93 individuals who are 18 years and over living in households and 30 individuals who will reach 18 years or over by the end of 2029. This could potentially result in the need for up to 62 additional Traveller specific accommodation units during the term of the programme for future family formations.

POLICY STATEMENT

The Council is dedicated to ensuring that all Traveller specific accommodation is provided to the highest standards in consultation with Traveller advocacy groups and residents. This will be achieved through implementation of the actions under our Equality Action Plan for Traveller specific accommodation pursuant to section 32(1) of the Irish Human Rights and Equality Commission Act 2014.

Our aim is to provide Traveller accommodation that is located close to essential services such as schools, public transport, GP services, shops, playgrounds, and sports clubs. We will achieve this aim through a combination of construction and refurbishment programmes including the development of new sites, re-development of existing sites, developments under Part V of the Planning and Development Act 2000, casual vacancies as they arise and standard social housing.

To implement this programme the Council will work with Travellers in need of housing, Clondalkin and Tallaght Traveller Development Groups, the Local Traveller Accommodation Consultative Committee, adjoining local authorities and national organisations.

The Council will continue to provide on-site services to Travellers, including cleaning, maintenance of sites and will provide mobile caretaker services. Eligibility for Traveller specific accommodation will be in accordance with the criteria eligible for social housing support within the South Dublin County



Council's administrative area. Assistance with applications for housing will continue to be made available to Travellers wishing to avail of standard social housing, voluntary housing and Housing Assistance Payment (HAP) and the Rental Accommodation Scheme (RAS).

The Traveller accommodation team is available to attend meetings upon request to outline proposals for new permanent Traveller-specific accommodation in various areas. All proposals for permanent Traveller-specific accommodation will adhere to the Part 8 Planning Process, as stipulated in the Local Government (Planning and Development) Regulations 2001 (as amended) and the Planning and Development Acts 2000 (as amended) and Section 179A of the Planning and Development Acts 2000 (as amended). Unauthorised encampments and illegal occupiers will be addressed in accordance with the relevant legislation/protocols.

Nothing in this programme shall prevent the Council from exercising the powers conferred under Section 2 (9) of the City and County Management (Amendment) Act 1955, (as amended by Section 27 of the Housing Act 1988 and Section 24 of Housing (Traveller Accommodation) Act 1998 in an emergency.

STRATEGY STATEMENT

Our mission is to provide Traveller specific accommodation that meets the highest standards, culturally appropriate and well-integrated in our communities. We aim to achieve this through a comprehensive and collaborative approach involving key stakeholders. The key objectives are:

Casual vacancies on Traveller specific sites

Address immediate housing needs by efficiently filling available vacancies as they arise within existing accommodation.

Refurbish and extend existing dwellings

Undertake refurbishment and upgrades as necessary to enhance the quality and sustainability of current accommodation.

Redevelop existing group housing and bay sites

Upgrade and modernise existing Traveller accommodation sites to improve living conditions.

Standard social housing and social housing supports

Facilitate access to various social housing options for Travellers including standard social housing, Approved Housing Bodies, Housing Assistance Payment (HAP) and the Rental Accommodation Scheme (RAS).

Construct new Traveller specific homes

Develop new, high-quality accommodation sites to meet the growing needs of the Traveller community now and into the future through the Council's housing construction programme and Part V developments.

The Traveller accommodation unit in partnership with our Architectural Services team will lead on the delivery of this programme. To ensure effective implementation and oversight there will be regular consultation and engagement with members of the Traveller community and continuous engagement with the Local Traveller Accommodation Consultative Committee (LTACC) to ensure stakeholder input and alignment. Transparency and accountability will be maintained by reporting progress to:

- Local Authority Accommodation Consultative Committee
- The Council's Senior Management Team
- Housing Strategic Policy Committee
- Local Area Committees

A project management approach will be employed to facilitate the timely delivery of the newly constructed and refurbishment of Traveller specific accommodation. Key elements include milestone tracking through regular monitoring and review of project deliverables and risk management to identify and mitigate potential risks to ensure timely and within-budget project completion. The success of this programme is contingent on securing necessary funding from the Department of Housing, Local Government and Heritage. We will advocate for and prioritise the allocation of these funds to support the Council's strategic objectives.

We will continue to work in partnership with the other Dublin Local Authorities to identify common Interests to enhance programme outcomes, promote co-operation to streamline processes and share best practices with regards to modern methods of construction and efficient use of resources to deliver high-quality accommodation solutions for the Traveller community. By adopting this strategic approach, the Council is committed to enhancing the quality and availability of Traveller Accommodation. Through diligent planning, stakeholder engagement, and effective resource management, the Council aim to create sustainable and culturally appropriate housing solutions for the Traveller community.

SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

The County Development Plan references that the County's Traveller Accommodation Programme as setting out Council policy regarding the provision of Traveller specific accommodation. The Council will, as necessary, continue to update its accommodation programme for the Travelling Community in accordance with the principles of proper planning and sustainable development. The following objectives are included:

H4 Objective 1: To implement the South Dublin County Council Traveller Accommodation Programme.

H4 Objective 2: To ensure that Traveller Accommodation is located in proximity to services, including public transport, schools, GPs, shops, playgrounds and sports clubs.

H4 Objective 3: To provide long term sustainable Traveller Accommodation developments, while ensuring proper provision of infrastructure.

H4 Objective 4: To ensure that all Traveller Accommodation is provided to the highest standard following detailed consultation with local communities and Traveller advocacy groups.

H4 Objective 5: To ensure that every halting site has basic amenities such as water, ESB, refuse collection and sanitation and are situated to enable as much integration with local communities as possible, that is, access to schools, GPs, shops, playgrounds and sports clubs.

H4 Objective 6: To provide transient sites in accordance with legislation and to liaise with the other Dublin Local Authorities on the need for and, if necessary, identify suitable locations for such provision in order to provide for a coordinated approach in the Dublin Region.



MAP EXISTING AND PROPOSED SITES FOR TRAVELLER ACCOMMODATION 2025-2029



Map Legend

- Group Housing
 - ▲ Voluntary Housing
 - Permanent Halting Site
 - ◆ Temporary Site
 - ★ Emergency Site
 - TA Proposed sites identified to provide Traveller Accommodation as per the County Development Plan, Adamstown SDZ and new location for replacement Emergency Site.
 - Local Electoral Areas
 - County Boundary
- Clondalkin
 - Firhouse-Bohernabreena
 - Lucan
 - Palmerstown-Fonthill
 - Rathfarnham-Templeogue
 - Tallaght Central
 - Tallaght South

PROJECTED TARGETS AND IMPLEMENTATION 2025-2029

CASUAL VACANCIES

Traveller households will be accommodated through casual vacancies that may arise in existing Traveller-specific accommodation units as well as through transitions to Group or Standard Housing. In the previous programme, 41 properties were returned and based on these figures, we predict that 50 units will be returned during the term of this programme.

Casual Vacancies	Average Vacancy Rate
2025	10
2026	10
2027	10
2028	10
2029	10
Total	50

NEW SITES

All new permanent Traveller specific accommodation will be designed in accordance with the DHLGH guidelines. The Council is also committed to exploring opportunities with Approved Housing Bodies including CENA, a Traveller-led approved housing body. Designs for new sites will be submitted to the relevant local area committee for review. The preferences of Travellers for grouped housing over halting sites will be considered. The implementation of the TAP, as outlined below, is contingent upon securing funding from DHLGH as well as obtaining the necessary planning approvals.

Location	No. of Group Houses	Electoral Area	Reference
Adamstown	17	Lucan	Adamstown SDZ
Rathcoole	10	Clondalkin	Masterplan SDCC Lands in Rathcoole
Newcastle	6	Clondalkin	Part V
Total	33		



The following is a list of indicative locations in the County Development Plan for Traveller accommodation, with sites to be selected based on need:

1. Brittas
2. Bustyhill
3. Steelstown
4. Windmill Hill/Blackchurch

Please note additional site(s) may be identified by the Council during this programme, subject to planning approval and based on need, availability, and suitability of sites

CONSTRUCTION AND REFURBISHMENT PROGRAMME ON EXISTING SITES

To address the accommodation needs of the Travellers, the Council propose a construction and refurbishment programme on several existing Traveller accommodation sites in consultation with the residents. The redevelopment of these sites is contingent upon funding from the DHLGH and the necessary planning approval.

The construction and refurbishment programme aims to resolve quality, design and provision challenges at existing sites. Our assessment has identified several households currently residing in halting sites, with or without day houses, who have expressed a preference for group housing. In response, we are proposing the construction and refurbishment of existing sites to develop long-term sustainable Traveller specific homes. It is acknowledged that managing expectations and obtaining consensus on the design of new accommodation options and the temporary re-location of families during the construction period can be challenging. This process requires collaboration with residents to address their concerns and preferences effectively.

The Council is committed to working with residents to resolve any design and provision challenges on existing sites through open communication, transparent decision making and real engagement to address any conflicts or disagreements that arise in a respectful and constructive manner. The consultation process is conducted through in-person meetings as well as utilising our online digital platforms.

We will actively involve the broader Traveller community and their representatives, including the Tallaght Travellers Community Development Project and Clondalkin Traveller Development Group. This involvement will be endorsed by the Local Traveller Accommodation Consultative Committee, ensuring that the voices and perspectives of the Traveller community are central to the decision-making process.

REDEVELOPMENT OF SITES AT DESIGN/PLANNING STAGE

Location	No. of Units	Electoral Area	Status
<u>Owendohar Haven</u>	9	Rathfarnham/Temploeogue	179A- Planning Exemption
Old Castle Park	20	Clondalkin	179A- Planning Exemption
<u>Kishogue Park</u>	15	Lucan	179A- Planning Exemption
Total	44		

OTHER SITES UNDER CONSIDERATION FOR RE-DEVELOPMENT

Feasibility studies will also be undertaken at the following existing locations to examine the potential for the construction of new group housing schemes:

Location	No. of Units	Electoral Area	Status
Belgard Park	10	Tallaght	Feasibility Study
Hazel Hill	6	Tallaght	Feasibility Study
Stocking Hill	6	<u>Firhouse/Bohernabreena</u>	Feasibility Study
<u>Cherryfield</u>	10	Rathfarnham/Temploeogue	Feasibility Study
Total	32		

STANDARD LOCAL AUTHORITY HOUSING/APPROVED HOUSING BODIES

The Council has identified the need to provide accommodation for 63 Traveller households in standard local authority or voluntary housing within the period of this TAP. Travellers will be offered housing in accordance with the Council's Allocations Scheme. This scheme outlines the criteria and order in which housing is allocated to applicants. Staff are available to assist individuals with completing their housing applications. This support aims to ensure that applicants have the necessary help and guidance to successfully navigate the application process and support those with digital literacy issues. This approach aims to provide appropriate housing options for Travellers while promoting sustainable communities and ensuring tenants are well-prepared for their new homes.

Standard Social Housing	Target- No. Allocations
2025	13
2026	13
2027	13
2028	12
2029	12
Total	63



TRANSIENT SITES

The Irish Human Rights and Equality Commission requested South Dublin County Council to prepare and implement an Equality Action Plan focusing on Traveller Accommodation. A key aspect of this plan involves addressing the needs of Travellers who are nomadic within and through the county by providing transient halting site bays as required.

The Council has proactively engaged with members of the Traveller community within its functional area through various initiatives, including an assessment of need conducted in March 2024 and focus groups held before the publication of the draft Traveller Accommodation Programme. These efforts aimed to ascertain genuine preferences regarding transient halting sites and outline actions to be undertaken based on such engagement.

In line with its commitment to consult with the Traveller community and relevant stakeholders, the Council is in the process of appointing a dedicated Traveller Liaison Officer to engage with the Traveller community on relevant matters, including the provision of a transient site in the County.

The Council recognises the importance of collaborating with other Local Authorities for a coordinated approach to the provision of transient sites in the Dublin region. It will also cooperate with national bodies, including the Traveller Programme Board and the Department of Housing, Local Government and Heritage with regards to exploring the approach to the provision of a network of transient sites at regional and national level.

The assessment of housing need conducted in March 2024 revealed a lack of clear preference among Travellers residing in South Dublin regarding transient sites. Focus group participants emphasised the need for more culturally appropriate housing options, including transient sites, to provide greater choice while recognising potential issues such as feuds and conflicts which may arise. Effective management and maintenance of transient sites are deemed critical to mitigate such challenges with a necessity for a transient facility to be structured and well-managed to address these concerns.

Following consultations with other Dublin Local Authorities, it has been confirmed that there is no consensus among Travellers for transient sites in their respective areas. Recognising that the provision of transient sites is a national issue requiring availability of a funding stream, updated guidance and advice on their management and control, it was collectively agreed among the four Dublin Local Authorities to adopt a regional approach to addressing this matter.

As such, the four Dublin Local Authorities will collaborate on a regional response to the provision of Transient sites. However, consideration for their provision within the Dublin regional area will only be given if there is consensus among Travellers in the region for these sites. This consideration will be coupled with the development of a national policy governing their location, management, and control. This approach ensures alignment with the needs and preferences of the Traveller community while also promoting consistency and coherence in policy implementation across the Dublin region

TEMPORARY / EMERGENCY SITES

Within the South Dublin County, there are currently two emergency/temporary facilities for Traveller households. The Council is dedicated to relocating these sites in consultation with the residents by providing safe, fully serviced, high-quality accommodation during the lifetime of this programme. The sites in question are located at Lock Road, Lucan, Co. Dublin, and Whitestown Way, Tallaght, Dublin 24.

The emergency site at Fonthill Way has been successfully closed, with families from this location accommodated in a new group housing scheme in close proximity. Additionally, the 3 Bay emergency site at Lynch's Lane will be decommissioned as part of the Kishogue Park/Clonburriss Phase 1 Development. The Council remains committed to ensuring all Traveller households have access to appropriate, permanent housing solutions.

UNAUTHORISED SITES

The law regarding unauthorised sites is outlined in the Housing (Traveller Accommodation) Act 1998 and the Housing (Miscellaneous Provisions) Act 2002. The Council will continue to use these powers where appropriate. In addition, in areas where High Court injunctions are in place the Council will seek the enforcement of these orders.

HOMELESSNESS

The Council recognises the vulnerability of Travellers who are experiencing homelessness, and we continue to collaborate closely with the Dublin Regional Homeless Executive (DRHE) to assist individuals who are homeless or at risk of becoming homeless. As outlined in the Council's Allocations Scheme, priority is awarded to homeless persons alongside other specific categories of individuals in need of housing. Families and other applicants presenting as homeless, as well as those with priority status, are allocated social homes as they become available, based on their respective times on the waiting list.

In the interim, while awaiting the availability of social homes, homeless families are supported by the Council's Homeless Unit which helps those who find themselves homeless or at risk of becoming homeless. The Unit provides comprehensive outreach assistance as well as detailing emergency accommodation options, including central placement, self-accommodate, family hubs, and other supported accommodation. The Council is committed to ensuring that all individuals in need receive the necessary support and guidance during their time of need and we recognise the literacy and digital issues facing Travellers who are seeking to access Homeless services.



AGE FRIENDLY ACCOMMODATION

It is proposed to include the provision of housing specifically designed/adapted for older members of the Traveller community within the duration of this TAP. While it is noted that the life expectancy of Travellers is generally lower, there is an observable increase in the age profiles with some older Traveller tenants residing in accommodation that is no longer suitable for their needs.

This trend necessitates a strategic approach to ensure that housing provision is aligned with this evolving demographic. In response to these changes, the Council aims to explore the potential for developing accommodation units designed for older persons in both new and existing developments. This initiative will involve a comprehensive assessment of current Traveller specific accommodation and consultation with key stakeholders to ensure the needs and preferences of older tenants and applicants are adequately met.

This will ensure that older tenants have access to safe, comfortable, and appropriate housing that supports their health and well-being. These new / refurbished units will be designed to accommodate the specific needs of older individuals, including accessibility features and proximity to essential services.

This initiative will contribute to the more efficient use of existing housing resources. As older tenants move into accommodation better suited to their needs, larger dwellings will be vacated. These larger units can then be reallocated to families on our Traveller specific housing waiting list or to those currently experiencing overcrowded living conditions. This reallocation will help alleviate housing pressures and improve living conditions for other tenants.

Furthermore, the development of specialised housing for older persons aligns with broader strategic goals of the Council and its policy of providing age friendly housing. By focusing on the provision of suitable accommodation for older persons, we aim to create a more balanced and responsive housing system that benefits all members of our community.

UNIVERSAL ACCESS

The Council is committed to providing universal access disability housing designed to be accessible and usable by all people, regardless of age, disability, or other factors. This type of housing ensures that everyone, including individuals with physical, sensory, or cognitive impairments, can live independently and comfortably. Key features of universal access disability housing include accessible entrances and exits, interior accessibility, adaptable bathrooms and safety features. This is part of our broader efforts to promote inclusive design and ensure that the built environment accommodates the needs of all individuals, supporting independence and enhancing quality of life for people with disabilities.

CARAVAN LOANS

It is acknowledged that Travellers can face difficulty in accessing finance to purchase caravans/mobile homes. In response, we volunteered to be one of the pilot local authorities for the new Caravan Loan Scheme launched by the Department of Housing, Local Government and Heritage in 2021, providing loans up to a maximum of €30,000, increased to €40,000 following an evaluation of the National Pilot Scheme. We also participated in the 2023 National Caravan Loan Scheme. During the lifetime of the TAP 2019-2024, we have provided preferential loans to Travellers to purchase their own caravan/mobile home for use as their primary residence. Under this initiative, 21 preferential loans, each up to a maximum value of €40,000, were advanced to Traveller households.

The DHLGH has commenced a comprehensive evaluation of the pilot caravan loan schemes. This evaluation, based on data collected from local authorities and other stakeholders, aims to explore options for the introduction of a permanent scheme.

The Council remains committed to facilitating access to suitable accommodation for Travellers through this financial support scheme.

SUMMARY

It is estimated that there is a current demand for 146 Traveller households to be accommodated over the next five years. The targets below have been set subject to funding from the Department of Housing, Local Government and Heritage, Planning Approval and Casual Vacancies which will arise during the term of the programme.

Please note: This figure does not include 123 individuals identified who will be 18 years or over by the end of 2029. This could potentially result in the need for up to 62 additional Traveller Specific/Standard Housing homes during the term of the programme for future family formations

Standard Social Housing	63
Group Housing	77
Bays	6
Total	146

MANAGEMENT AND MAINTENANCE OF DEVELOPMENTS

In line with our commitment to maintaining and managing all halting sites and group housing schemes to the highest standards, the Council is actively engaged in a programme aimed at enhancing and upgrading existing permanent Traveller-specific accommodations. To further this goal, we have initiated a pilot project providing a weekly waste removal service to selected halting sites. This pilot will undergo a comprehensive review, and contingent upon its success, we will consider extending this service to additional sites throughout the County.



PRE-LET REPAIRS

Prior to the letting of Traveller specific accommodation, the Council will undertake the necessary pre-letting works are carried out to ensure it meets the minimum standard for rented properties. Once the tenant (s) moves in, they will be informed of how to report any issues or concerns they may have about their home. All maintenance requests will be categorised and dealt with depending on the nature of the problem. The Traveller Liaison Officer's role will be to provide support services to help tenants settle into their new accommodation, including guidance on maintenance and usage of the facilities.

By implementing the above the Council can enhance the efficiency and effectiveness of their pre-letting process, ensuring tenants of Traveller-specific accommodation are well-informed and supported in their new homes.

MAINTENANCE AND REPAIR SERVICE

The Council is responsible for repairs associated with the general wear and tear of houses and bays. Where a repair is necessary due to fair wear and tear, the Council will ensure that this is completed in a reasonable time- frame. Tenants should also be aware of their responsibilities regarding the upkeep of the property as set out in their tenancy/bay licence agreement. An out- of- hours emergency maintenance service is provided on weekday evenings, weekends and bank/ public holidays.

FIRE SAFETY

The Council has taken a number of actions to maintain fire safety and fire safety awareness on Traveller specific sites. We have engaged the services of a fire safety consultant to conduct a comprehensive fire safety audit of all Traveller-specific accommodation in the County.

The Council provides fire safety equipment including a fire blanket, carbon monoxide alarm, and smoke detector to residents of all caravan units. A programme for servicing and replacing fire extinguishers is in place. Routine inspections of the electricity supply and gas installations are carried out at all halting sites.

The Council is required to submit an annual review of fire safety in all types of Traveller specific accommodation to ensure that the appropriate fire safety measures are in place. Fire awareness training for members of the Traveller community is arranged through the Fire Brigade on dates throughout the year in conjunction with the Tallaght and Clondalkin Traveller Development Groups.

ANTI-SOCIAL BEHAVIOUR

The Council has a strict policy against anti-social behaviour in both Traveller-specific and standard social housing. Any such behaviour will be addressed following the guidelines set out in our Anti-Social Behaviour Strategy. The Council will engage with representatives from residents or community groups to discuss issues related to the management and maintenance of Traveller accommodation whenever necessary. We also work with mediation specialists to deal with the issue of feuding as it arises.

TENANT PARTICIPATION AND ESTATE MANAGEMENT

The Traveller accommodation unit welcomes and encourages tenant participation in the management and maintenance of our Traveller specific accommodation. Funding under a 'Traveller Participatory Budgeting' initiative is available to Tallaght and Clondalkin Traveller Development Groups to design and deliver training and capacity building for Travellers who wish to participate in the establishment of resident's associations and cultural activities.

There is a site and waste management subgroup of the LTACC to review and address illegal dumping, waste burning and waste collection at Traveller accommodation sites and to work positively with Travellers in developing the Traveller economy. The group meets regularly and provides updates at the bi-monthly meetings of the LTACC. The objectives of the group include :

- To examine how pro-social site award initiatives like participatory budgeting and Tidy Towns can be adapted and promoted within the sites.
- To encourage engagement with members of Traveller community, with onsite discussions and consultation in a structured way.
- To examine and advise on good estate management protocols for sites.
- To ensure value for money and apply for any funds available.
- To examine how to address the enterprise needs of Travellers involved in waste collection.
- To ensure waste compliance measures and monitoring continues where necessary.

TRAVELLER ACCOMMODATION UNIT

The Traveller Accommodation Unit is a one stop shop for the provision of housing support to members of the Traveller Community. The unit is dedicated to keeping both Travellers and the general public well-informed about the development of proposals for permanent Traveller-specific accommodation. Staff actively participate in meetings with Travellers, local Traveller support groups, resident groups, and stakeholders to discuss and provide updates on matters related to accommodation. Additionally, the unit holds a monthly outreach clinic in collaboration with the Tallaght and Clondalkin Travellers Community Development Project, hosted at their premises on the first Tuesday and Wednesday of each month.

At our dedicated Housing Centre in County Hall, staff from the unit are available to engage with Travellers, addressing their concerns and helping with housing online queries and support services. This initiative aims to foster open communication and support for the Traveller community regarding housing matters. Training has also been provided to the local Traveller support groups so they can assist the Traveller community as required.

Approval has been granted for the recruitment of a dedicated Traveller Liaison officer who will work with and support Travellers with their housing options. This addition will greatly enhance the team and strengthen the Council's efforts in providing effective support and services to the Traveller community.



LOCAL TRAVELLER ACCOMMODATION CONSULTATIVE COMMITTEE (LTACC)

The LTACC is integral to the consultation process regarding Traveller accommodation. It ensures accountability and facilitates communication with the Traveller community. Among its roles and responsibilities, the LTACC is consulted on matters related to Traveller accommodation. It plays a key consultative role in the provision and management of Traveller accommodation. Updates and progress reports on the TAP are provided to the committee at bi-monthly meetings.

A site and waste management subgroup was established by the LTACC to review and address issues such as illegal dumping, waste burning, and waste collection at Traveller accommodation sites in the County. A report from this subgroup is provided to the LTACC at each meeting.

The LTACC are informed on all aspects of Traveller accommodation development, management, and related matters to ensure that issues are systematically addressed, with regular updates and consultations involving all relevant stakeholders.

CONSULTATION

In addition to this survey and to the assessment of housing need, the Council in collaboration with the Clondalkin and Tallaght Travellers Community Development teams, conducted three focus group meetings in April 2024. The needs and preferences of the participants were explored and the requirement for diverse and culturally appropriate choices was highlighted. Participants identified a desire for well-structured sites with safe and healthy living conditions and dedicated space for cultural practices. A desire for proximity to family was also expressed. The participants highlighted the need for genuine consultation with accountability and transparency.

The recommendations are classified as follows and full report is available in the appendices:

Quick Wins/Short-Term Solutions

- Enhanced Communication and Accountability
- Improved Maintenance and Infrastructure
- Education and Awareness of Social Housing Supports
- Conflict Management
- Longer-Term

Cultural Competence and Inclusion

- Legislative and Policy Changes
- Improved Living Conditions
- Comprehensive Support Services
- Long-Term Planning and Community Involvement

As part of the preparation of this draft programme submissions were requested. Submissions were received from Tallaght Travellers Community Development Project, Clondalkin Travellers Community Development Project, National Traveller MABS, Irish Coalition to End Youth Homelessness and Irish Traveller Movement / Pavee Point and were taken into consideration in the preparation of this draft programme. (please see Appendices). The anonymised findings of the focus groups held in April 2024 were also incorporated into the development of the TAP 2025-2029.

REVIEW OF THE TRAVELLER ACCOMMODATION PROGRAMME 2025-2029

Annual targets will be reviewed on an ongoing basis to ensure that progress is being maintained. Regular reporting will be provided to the Senior Management Team, the Housing Strategic Policy Committee and the Department of Housing, Planning and Local Government. A report on all activities under this programme will also be furnished at each LTACC meeting.

Section 17 (1) (a) of the Housing (Traveller Accommodation) Act, 1998, provides that a relevant housing authority shall review its accommodation programme at least once in each three-year period, or at such time as directed by the Minister. Any amendment to the accommodation programme proposed following any such review, must be made within seven months and is subject to the same procedures and requirements, including public consultation.

The Minister has, under section 17(1) of the 1998 Act, that a review of the next accommodation programme should be carried out no later than 30th June 2027.

CLOSING DATE FOR SUBMISSIONS

Copies of the draft Traveller Accommodation Programme will be available for inspection at County Hall, Tallaght, Civic Offices, Clondalkin and electronically on www.sdcc.ie

The latest date for the receipt of written submissions on the draft Traveller Accommodation programme is the 31st August 2024. Written submissions can be made to the Traveller Unit, South Dublin County Council, Housing, Social and Community Department, County Hall, Tallaght, Dublin 24 or are available for inspection online during the same period on the Council's Public Consultation Portal (<http://consult.sdublincoco.ie>)



Appendix A | A. LTACC Membership

Membership – Local Traveller Accommodation Consultative Committee

Cllr. Gus O’Connell (Chair)
Cllr Theresa Costello
Cllr. Shane Moynihan
Cllr. Dermot Richardson
Cllr. William Carey
Cllr. Leah Whelan
Emily Smartt – Clondalkin Travellers Community Development Group
Geraldine Carr – Clondalkin Travellers Community Development Group
Patrick Nevin – Tallaght Travellers Community Development Group
Mary Cassidy - Tallaght Travellers Community Development Group
Colm Ward – Chief Executive – former Director of Services Housing
Elaine Leech – Acting Director of Services, Housing
Mary Connell – Acting Senior Executive Officer Traveller Accommodation Unit
Niamh Carton- Administrative Officer – Traveller Accommodation Unit
Steven Masterson – Senior Staff Officer- Traveller Accommodation Unit
Sean Logue – Senior Social Worker – Traveller Accommodation

Clondalkin Travellers Development Group

Submission on the Draft Traveller Accommodation Programme 2025 - 2029

February 2024

Clondalkin Travellers Development Group (CTDG) welcome the opportunity to make a submission to the development of the Draft Traveller Accommodation Programme 2025 – 2029. We are making this submission in good faith and in the belief that it will be considered fairly, and our recommendations will be taken on board.

Many Travellers in the SDCC area are living in very poor conditions. Traveller families are traditionally larger than the settled community. Overcrowding and substandard accommodation has become the norm for many of the Traveller families living in Ireland today. The shortage of accommodation has been impacted negatively by the shortage of housing nationally.

Poor accommodation is impacting on the employment, educational and health outcomes for Travellers. CTDG works with Travellers to ensure better outcomes for the community. On the basis of their culture many Travellers prefer to live in culturally appropriate or Traveller specific accommodation where large extended families can live together. Substandard accommodation can contribute to poor physical and mental health outcomes for Travellers and can also impact on their educational and employment outcomes.

Traveller Accommodation – Caravan/Trailers/Mobile Homes

Many families in the area are living on sites. In many cases these sites are sub-standard as are the accommodation units in which the families live. A recent research study undertaken by National Traveller MABS into the Energy Efficiency of Mobile Homes for Irish Travellers Communities noted that ‘In the Republic of Ireland, there are currently no specific regulations or codes guiding the manufacturing and energy efficiency aspects related to the construction of mobile homes. In particular those intended for year-round living.’¹

Almost all of the recommendations in the MABs study were focused on the work of the Dept of Housing, Local Government and Heritage. We recommend that SDCC actively promote and support the recommendations of this research study with the relevant government Departments.

Caravan Loans

It is our understanding that a review of the caravan loan scheme is currently being undertaken. CTDG contend that there are limitations to the caravan loan scheme. In 2018 National Traveller MABs published ‘A Small-Scale Study into the Cost of Mobile Homes/Trailers for the Purpose of Social Housing for Travellers’¹. This report questioned ‘whether or not a loan scheme is the most appropriate vehicle for the provision of good quality accommodation to Travellers who are largely in need of social housing and recommends exploration of alternative rental schemes.’

We recommend that SDCC provide a rental schemes as an alternative to Travellers engaging in accessing loans through SDCC to purchase caravans that do not meet the family’s needs and that have an impact on fuel poverty as they are not adequately insulated.

¹ <https://www.ntmabs.org/publications/development/2018/national-traveller-mabs-mobilehomes-study.pdf>.
Submission on Preparation of the Draft Traveller Accommodation Programme 2025 - 2029

Assessment of Need

According to the 'Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025 – 2029' issued by the Department of Housing Local Government and Heritage we note that between January and February SDCC is to conduct an assessment of need to include:

- an estimate of existing and projected accommodation needs during the period of the TAP
- the types of accommodation that are required e.g. group housing, halting sites, transient sites

We recommend that the new TAP will:

- undertake an extensive needs assessment of all Traveller families and individuals including those in homeless accommodation, families doubling up in bays, living with a disability and living with other family members and also include families and individuals who are coach surfing (in reality these individuals are homeless).
- Include the provision for family growth and new family units.
- acknowledge that many Travellers may wish to live in Traveller-specific accommodation and make appropriate plans to develop appropriate sites to accommodate this.

Lack Of Accommodation

CTDG is aware of an increase in the number of married children living with their parents in unsuitable accommodation (doubling up). We are also aware of an increase in the number of homeless young families and newly married couples. We recommend that there is an increase in the development of Traveller Specific units throughout the county to accommodate these new families and reduce the pressure on families caused by overcrowding in multigenerational family units which have negative impact on the physical and mental health of Travellers.

We recommend that SDCC:

- carry out an assessment of the current accommodation needs of the Traveller Community including projections on the future needs of the community within the period of the TAP 2019 to 2024.
- draw down their Annual Budget Allocation for Traveller Specific Accommodation to help alleviate the accommodation crisis facing Travellers living in the SDCC area.

As a project working on the ground we have become aware of the lack of accommodation for women in crisis situations or leaving homes where there is violence. We are also aware that almost all refuges have a 'one Traveller family' policy.

We recommend that SDCC ensures that accommodation is available for women in these situations either through directly providing it or by working with agencies that provide these services.

It is our understanding that the Traveller Accommodation Unit does not deal with Travellers living in Standard Housing. Many families accepted standard accommodation, as given the current housing crisis, they felt that they had no other option.

We recommend that:

- the TAU is inclusive of all Travellers and consults with all Travellers living in the area, including Travellers living in standard housing, in relation to their accommodation needs
- SDCC commit itself to accommodating Travellers in the type of accommodation which best suits the needs of the families and individuals i.e. if Travellers wish to live non sites or in group housing that sites and group housing is developed with appropriate resources to meet the needs of families (to include play facilities for children, if families want to live in standard accommodation that this is provided for them possibly through the purchase of homes using the Traveller Accommodation Budget.
- that play facilities be included in new and upgraded developments of Traveller accommodation.

Development of Existing Sites

CTDG welcomes the development and upgrading of existing Traveller accommodation sites. While these developments are necessary there is concern that these developments are only focussing on accommodating current residents and that there is no forward planning to ensure adequate accommodation for future new families.

For example, Oldcastle Park in Clondalkin which at its peak could accommodate in excess of 50 families is being replaced by accommodation for, in the region of 20 families. Also here is no forward planning for the future growth of these families many of whom have children who will be getting married in the foreseeable future and who will be seeking accommodation.

We recommend that:

- meaningful consultations with the community is undertaken in relation to their needs and to allay fears in relation to these new developments.
- SDCC continue to upgrade existing Traveller sites while also ensuring that the number of Traveller Specific Traveller Accommodation Units is not only maintained at the current level but is increased to accommodate new families (who are currently living with their parents) and the projected growth needs of the Traveller community.

- bespoke engagement and consultation with Traveller families on their accommodation needs at all stages of the process that involve the key decision-makers, including the architect, working closely with the families.

Upgrading of Group Housing

Many of the group housing schemes are in need of retrofitting including an upgrade of windows and doors and the installation of energy efficient boilers to ensure that the units are fuel efficient. This would impact on the cost of home heating for the families with a reduction in fuel poverty and an impact on the environmental crisis facing us all.

We recommend that SDCC undertakes a survey on the level of insulation currently in the houses in group housing schemes and following from that introduces a phased upgrade of insulation and upgrade of windows and doors and installation of energy efficient boilers as necessary.

Lack of Transient Sites.

We acknowledge that SDCC state that they 'will consider the provision of transient accommodation' but that these 'should only be provided following the full provision of the Traveller specific accommodation requirement of Travellers indigenous to South Dublin County'.

As a means of acknowledging and providing for the nomadic way of life of members of the Traveller community SDCC should prioritise the development of at least one transient site within the county and that it is not dependent on the 'full provision' of the Traveller specific accommodation requirements of Travellers indigenous to SDCC.

We recommend that:

- a needs assessment for transient sites within the county is undertaken asap.
- at least one appropriately managed transient site be established in the SDCC area during the term of the TAP 2025 – 2029

Monitoring progression of the TAP

To ensure that actions are undertaken we recommend that annual reports are drawn up with Key Performance Indicators identified. Progress should then be measured against these actions.

ⁱ National Traveller MABs 'Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities' August 2022

Tallaght Travellers Community

Development Project

12 Brookfield Court

Brookfield Road

Dublin

D24YW80

Dear Chair,

Tallaght Travellers Community
Development: Submission to
the Local Traveller
Accommodation Consultative
Committee: Traveller
Accommodation Programme
2025-2029

Proposal to the Local Traveller Accommodation Consultative Committee from Tallaght Travellers Community Development Project regarding submission for inclusion in the Traveller Accommodation Programme 2024 – 2029

Nationally Local authorities have failed to provide Traveller specific accommodation in accordance with their own targets. The number of Traveller families living in private rented (owned by private landlords) accommodation has increased and the number of families living in Traveller specific accommodation has steadily decreased over the past decade. This is the result of Travellers being forced out of their nomadic way of life by a combination of a lack of Traveller specific accommodation and legislation which criminalizes (and otherwise renders impossible) nomadism in Ireland. Travellers have been forced to abandon nomadism. State funded research establishes that failings on the part of local authorities, and not changes in the way of life of Travellers, have driven down the number of families opting for Traveller specific accommodation.

It is important to note that while the number of families living in unauthorized sites has decreased, in recent years there has been a marked increase in the number of families sharing accommodation and doubling up, and in some cases tripling up and couch surfing. Travellers have been one of the groups most affected by the housing crisis. With five times the number of families now sharing accommodation at national level, this accounts for 4,400 in overcrowded halting sites and in standard housing nationally. There are 654 families living in unauthorized halting sites nationally, as of the census 2016 there was 517 individual Travellers in homelessness, this is 11 times more than for the general population, as we don't have the latest census figures 2022, but anecdotal evidence shows that Travellers still make up a high percentage of the homeless population, the Cork And Kerry RTAWG (Regional Traveller Accommodation Working Group) published "Traveller Homelessness A hidden Crisis" which states that Travellers are 22 times more likely to become homeless, and that Traveller children makeup 12% of all others in emergency accommodation. The number of Traveller families living in rented accommodation has increased from 162 in 2002 to 2,387 in 2017, Which has contributed to the number of Traveller families becoming homeless, thus further fueling the

accommodation crisis. Travellers are 22 times more likely to be discriminated against by landlords, than the general population.

Tallaght Travellers Community Development Project are also concerned that the increased number of Travellers who are now wanting to reclaim their Nomadic tradition, that there are no transient halting sites within the South Dublin County Council area. It is with this concern that we are calling on the South Dublin County Council Local Authority to enter into discussions with the three other Local Authorities in the Dublin region, and that within at a twelve-month period that they would agree to providing a transient site in each of the four local authority areas, and failing this that South Dublin County Council agree to at least one transient site to be developed in South Dublin County Council. The Task Force Report 1995, a precursor policy to the (Housing Traveller Accommodation Act) 1998 identified the need for a network of 1000 Transient units for Nomadic Travellers, but in that time only 47 units were built, only one of which was used for the purpose of Nomadic Travellers, the rest are used to provide temporary relief for Traveller families who are awaiting permanent Traveller specific accommodation, however they have become permanent accommodation. In the twenty-year period (1997-2022) 989 bays of the government proposed 2,200 Halting site bays were not delivered while four times the target for standard housing was delivered. The largest supply was in standard housing with 4,830 families residing in 2022. Demonstrating a widespread practice of under delivery in Traveller culturally Specific Accommodation and an over delivery of standard sedentary/settled accommodation across local authorities. When we look at these figures we can see a clear strategy of assimilation and absorption policy at play. Tallaght Travellers Community Development Project are deeply concerned that there is still an assimilationist mindset pervasive within the sedentary system. As outlined in the National Traveller Roma Inclusion Strategy 2017-2021 on page 24 under cultural identity, it clearly outlines that the state will support, promote and value Traveller culture, identity and heritage. To the vast amount of the Traveller community seasonal nomadism is a very important part of Traveller heritage and identity. As outlined in the National Traveller Roma Inclusion Strategy 2017-2021¹ the state has clearly accepted and acknowledged that it has a duty of care to the protection and promotion of Traveller traditions.

When you combine this with the official state recognition of Traveller Ethnicity on march 1st 2017 it is imperative of South Dublin County Council to be proactive in regards to the

¹ National Traveller Roma Inclusion Strategy 2017/2021

promotion, protection, preservation and valuing of the Traveller community and their traditional ways of life.

National Traveller Roma inclusion Strategy 2017-2021

Accommodation: page 41

Theme and Objectives

Objective: *There should be adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers.*

Actions: 126/127

126. The National Traveller Accommodation Consultative Committee (NTACC), which includes all key stakeholders, is awaiting a review of funding, allocations, spending and outputs in relation to Traveller accommodation from the Housing Agency, which is expected imminently (June 2017). The NTACC has agreed a sub-group to examine and analyze the findings of the review, with a view to preparing a report and recommendations for the Minister for Housing and Urban Renewal as soon as possible after its receipt, which will include a review of the Housing (Traveller Accommodation) Act 1998.

127. The Department of Housing, Planning, Community and Local Government will ring-fence its Capital budget for Traveller accommodation and put robust mechanisms in place to monitor expenditure and delivery, including periodic reviews to assess progress in meeting needs and to identify new and emerging needs.

Objective: *Delivery of Traveller accommodation should be underpinned by a robust monitoring and evaluation framework, with a view to ensuring full expenditure of funds allocated for Traveller specific accommodation.*

Actions: 128/131

128. The National Traveller Accommodation Consultative Committee will examine how best to develop the capacity and operation of Local Traveller Accommodation Consultative Committees to maximize their contribution to local accommodation programmes and policies.

129. The Department of Housing, Planning, Community and Local Government will ensure that any guidelines developed by the National Traveller Accommodation Consultative Committee in relation to the operation of the Local Traveller Accommodation Consultative Committees are promulgated across all Local Authorities.

130. The Department of Housing, Planning, Community and Local Government will assess if there are any barriers to Travellers accessing social housing waiting lists.

131. The National Traveller Accommodation Consultative Committee and the Local Traveller Accommodation Consultative Committees will examine how best they can further develop the involvement of Traveller-specific accommodation tenants in issues relating to their scheme or site.

National Traveller Roma inclusion Strategy 2017-2021

Cultural Identity: page 24

Theme and Objectives:

Objective:

Traveller Culture, Identity and Heritage is supported and valued within Irish society.

Actions: 1/3

1. The Department of Justice and Equality will support, strengthen and expand Traveller Pride Week and increased national awareness of the event.
2. The Department of Justice and Equality will support International Roma Day.
3. The Department of Justice and Equality will develop other supports for members of the Traveller and Roma communities to develop new and ambitious initiatives exploring Traveller and Roma arts, culture and traditions.

National Traveller Roma inclusion Strategy 2017-2021

Cultural identity: page 24

Theme and Objectives:

Objective:

Travellers and Roma should be supported to develop, preserve and promote their cultural heritage.

Actions: 4/7

4. The Department of Education and Skills has prepared intercultural guidelines for primary and post primary schools to support all member of the school community to develop an inclusive school community. These guidelines will support schools in collaboration with Traveller and Roma organisations to develop education resources on Traveller and Roma culture and history for use in primary, post primary and adult education settings.

5. We will support Traveller and Roma cultural heritage Centre's and communications media to develop and promote their culture, stories and music of Travellers and Roma, including support for accessible cultural archives, to ensure that Travellers, Roma and members of the settled population can utilise and engage with materials on Traveller and Roma cultural heritage.

6. The Department of Agriculture, Food and the Marine will support a Traveller equine strategy to support Travellers to engage with knowledge and competence in the equine industry. Traveller horse owners/keepers must comply with all EU and national legislation relating to equine identification and animal welfare.

7. A targeted Traveller and Roma communications initiative will be supported to promote positive attributes and actions of both communities. It will facilitate counteracting negative mainstream media while engendering an increased sense of pride in the Traveller and Roma communities. Intergenerational learning, cultural continuity and positive self-identity for Travellers and Roma should be facilitated.

National Traveller Roma inclusion Strategy 2017-2021

Cultural Identity: page 24

Theme and Objectives:

Objective:

Intergenerational learning, cultural continuity and positive self-identity for Travellers and Roma should be facilitated.

Actions: 8/9

8. The Department of Agriculture, Food and the Marine will support the development of regional Traveller horse projects in association with Local Authorities to promote knowledge and care of horses, with a focus on animal welfare and road safety.

9. The Department of Justice and Equality will support the development of intergenerational initiatives in collaboration with local Traveller and Roma organisations to support cultural continuity and promote positive self-identity to promote, pass on and preserve knowledge of traditional Traveller and/or Roma crafts and skills.

The government report **“review of the funding for Traveller-specific Accommodation” and the implementation of Traveller Accommodation Programme (2000-2016)** which confirmed consistent failings in the delivery model with substantial under delivery over 16 years. With only **68% of units delivered**. There was **Underspending before, during, and post austerity (55 million)**. They identified a failed planning process, poor quality of building, no planning for future population growth and a lack accountability and transparency in local practice.

The difficulties and concerns relating to families sharing accommodation were highlighted as far back as the 2007 NTACC Annual Report:

‘It would be worrying if the number of families sharing all types of accommodation continued to increase, as sharing, by its nature, puts pressure on already limited resources and can worsen living conditions’.¹⁶

This question and the extracts from the reports clearly identifies the very serious issue of accommodation needs and wishes of the Traveller community in the South Dublin County

² Irish Traveller Movement Report in response to Ireland’s third examination under the International Covenant on Economic Social and Cultural Rights (September 2014)

Council area and at a National level. It also highlights the lack of culturally appropriate accommodation, which in turn has led to a serious increase in homelessness and overcrowding on the existing sites. A report published by the Irish Traveller movement has stated that Traveller families are 11 times more likely to be homeless and 22 times more likely to be discriminated by land lords through the HAP scheme.

Given the reality of available capital funding and the conditions that are placed on South Dublin County Council and other Local Authorities Nationally in regards to drawing down this funding and the ongoing and increasing needs of Traveller families in terms of accommodation, especially the increasing challenges of accessing private rented accommodation in the county. Tallaght Travellers Community Development Project are calling on department and the Government to support South Dublin County Council to both refurbish current Halting sites and develop new Halting Sites and Group housing schemes, that will be culturally appropriate to Travellers needs.

As we previously submitted to the TAP, we would once again like to propose that an additional element be included in the new Traveller Accommodation Programme that specifically addresses the needs of the families currently on the Traveller Accommodation List and that for each year of the life of the programme, one quarter of those families will be identified and targeted for specific accommodation assessment.

Tallaght Travellers Community Development Project would make itself available to work in partnership with South Dublin County Council and the Traveller Accommodation Unit staff team to identify the families considered most in need on the list, consult with them extensively as to their needs, their current circumstances and their preferences in terms of accommodation. Following that process, the Traveller Accommodation Unit in partnership with Tallaght Travellers Community Development Project would discuss the various accommodation options that might be open to the families in question. These options could include Traveller specific accommodation either in Halting Sites, Group Housing schemes or Standard Housing. Tallaght Travellers Community Development Project has over the last four years worked in a collaborative manner with South Dublin County Council, we have continued to strive to address the needs of the Traveller community and to support South Dublin County Council, to ensure a

smooth transition to the new Traveller Accommodation Programme 2025-2029. We would propose to identify the first 25 families by 2025, to enhance the culturally appropriate accommodation and living needs of the community in the Tallaght area of South Dublin Council Area. We hope that with our recommendations and the recommendations of National Traveller Organisations will be incorporated in the Traveller Accommodation Programme 2025-2029. We believe that if these recommendations are included in the (TAP) programme, we will be better able to respond to the accommodation crisis that the Traveller community are faced with at both a local and national level.

DRAFT

Tallaght Travellers CDP propose the following Recommendations:

Recommendations

- *We recommend that the South Dublin County Council Caravan Loan Scheme be replaced with a rental scheme for caravans, mobile home and modular housing, as agreed with each Traveller family to what is their culturally appropriate needs and requests.*
- *We recommend that that SDCC provides for supports to families for access to residential standard mobile homes. A study by NTMABS into the cost of mobile homes/trailers found a range of mobile homes on offer ranging from below €10,000 to over €100,000. We also found that a key factor in the cost of mobile homes was whether or not they were built to a residential standard in the first instance. This is denoted by the British Safety Standard BS3626 2015. Residential standard homes (as opposed to holiday homes) are more fuel efficient and provide families with a better quality of accommodation³.*
- *We recommend a fuel efficiency assessment of existing group housing schemes followed by a programme of upgrades to reduce fuel poverty amongst Travellers in South Dublin.*
- *Tallaght Travellers Community Development Project are calling on the South Dublin County Council Local Authority to enter into discussions with the three other Local Authorities in the Dublin region, and that within at a twelve-month period that they would agree to providing a transient site in each of the four local authority areas, and failing this, that South Dublin County Council agree to at least one transient site to be developed in the South Dublin County Council Region.*
- *Tallaght Travellers Community Development Project are calling on department and the Government to support South Dublin County Council to both refurbish current Halting sites and develop new Halting Sites and Group housing schemes, that will be culturally appropriate to Travellers needs, and will be developed and designed in collaboration with the Local Traveller Community and Local Traveller Organisations.*
- *Tallaght Travellers Community Development Project calls on South Dublin County Council: that the community development section along with the Traveller Accommodation Section would continue to work in collaboration with Tallaght Travellers CDP to support community development on the Traveller specific Accommodation*

³ National Traveller MABS; a small scale study into the cost of Mobile Homes/Trailers for the purpose of social Housing for Travellers.

- schemes, i.e. Halting sites and groups Housing, with regards to advising on financial assistance and available support.*
- *Tallaght Travellers Community Development Project are calling on LTACC to lobby the Department of Housing and Local Government to repeal the Criminal Trespass Legislation: (housing Miscellaneous Provision Act 2002)*
 - *Tallaght Travellers Community Development project are seeking the support of LTACC to call on South Dublin County Council to further develop the involvement of Traveller-specific accommodation tenants in issues to their accommodation schemes.*
 - *Tallaght Travellers Community Development Project calls on the South Dublin County Council to develop smaller builds for the older members of the Traveller community, that are to the highest standard in regards to the green environment.*
 - *undertake an extensive needs assessment of all Traveller families and individuals including those in homeless accommodation, families doubling up in bays, living with a disability and living with other family members and also include families and individuals who are couch surfing.*
 - *Include the provision for family growth by recognizing the age profile of Travellers and their tendency to marry and have children much younger than the general population, with this in mind we recommend including 14-year-old Travellers in future proofing the Traveller Accommodation Plan 2025-2029.*
 - *Tallaght Travellers Community Development Project Calls on South Dublin County Council to access the national Traveller accommodation funding to buy one off housing for Traveller specific needs.*
 - *Tallaght Travellers Community Development Project calls South Dublin county council to bring all Traveller specific accommodation under the remit of the Traveller Accommodation Unit.*
 - *Tallaght Traveller Community Development Project calls on South Dublin County Council to provide Traveller specific apprenticeships with the intention of offering full time employment across their various departments.*

We believe that this proposal is a very practical and realistic way of ensuring that Traveller families on the Traveller specific accommodation list are accommodated in a way that builds on the achievements to date of South Dublin County Council. It would also ensure that Travellers are consulted and supported by Tallaght Travellers CDP to actively participate in decision making in relation to their accommodation needs. For these reasons it is likely to be successful in the long term.

We would like to propose that the Local Traveller Accommodation Consultative Committee include this proposal in the Traveller Accommodation Programme 2025/2029.

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**Submission to the Development of the Traveller Accommodation
Programme 2025 - 2029**

**by Irish Traveller Movement, National Traveller Women's Forum and
Pavee Point Traveller and Roma Centre**

February 2024

Our Coalition: This report is submitted as a coalition of three national organisations which work towards achieving Traveller and Roma rights in Ireland.

The Irish Traveller Movement represent Traveller interests in national governmental, international and human rights settings, and challenge racism - individual, cultural and structural which Travellers face and promote human rights and equality.

Pavee Point Traveller and Roma Centre is a national non-governmental organisation working towards the attainment of human rights for Irish Travellers and Roma in Ireland and internationally since 1985.

The National Traveller Women's Forum is a network of Traveller women and Traveller organisations throughout Ireland that recognises the particular oppression of Traveller women in Irish society.

Traveller ethnicity

Travellers are an indigenous ethnic minority who, historical sources confirm, have been part of Irish society for centuries.

On the 1st of March 2017 Taoiseach Enda Kenny announced formal acknowledgment of Travellers as a minority ethnic group within the State.

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. The following recommendations have been informed by current legislation, reviews of previous TAPs, and the insight and lived experience of our members.

1. **Adherence to Guidelines:** DHLGH (2023) Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029 be fully endorsed by Each Local Authority
2. **Community Consultation:** It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018 stated, local authorities should collaborate closely with representative bodies of the Traveller community. By involving the Traveller community and their representatives, first hand lived experiences and insights will greatly contribute to the success of the programme.
3. **Determining Need:** Traveller Accommodation Programme must relate to both the existing accommodation needs *and* the projected need that will arise during the period of the programmes, across a range of accommodation options including standard and group housing, permanent residential sites for caravan/trailer, and transient sites. There must be clear and measurable targets.
4. **Inclusion in Development Plans:** County, City and Local Area Development Plans must include objectives for the provision of accommodation for Travellers and the use of particular areas for that purpose.
5. **Alignment with Housing Strategies:** Traveller accommodation should be planned in an intersectional way, informed by Housing for All, The National Housing Strategy(s) for Disabled People 2019 – 2027, The Action Plan on 'Housing Options for our Ageing Population', Housing First (Homeless Strategy) and the National Youth Homeless Strategy.

6. **Adoption of Equality Reviews:** The Irish Human Rights and Equality Commission report of Equality Reviews recommended the implementation of these should form the next TAPs.

7. **Acceleration of Accommodation:** We call for prioritisation of provision to Traveller families in shared and overcrowded accommodation & for overcrowding to be phased out as a matter of urgency.

8. **Budgets:** Each local Authority should provide costing for the full implementation of the Traveller Accommodation programme 2025-2029, including Maintenance, Capital Projects and any other allocations to support TAPs.

9. **Alignment with Health Determinations:** We endorse recommendations of The Traveller Health Unit to the Eastern Region to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2025-2029. Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. They should also be undertaken on existing accommodation and reviewed during the lifetime of the TAP.

10. **Map Traveller Accommodation in the TAP:**

- Each TAP should reflect the OPR's recommendation as referred in the DHLGH Circular 28/2022 Case Study Paper '*Traveller Accommodation and the Local Authority Development Plan*, that local authorities improve linkages between the Traveller Accommodation Programmes, whether existing or amended, and their Development Plans.
- Map sites in the TAP for the purpose of transient provision.

11. **Public Sector Duty:** The TAP should state the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality. The cultural needs of Travellers should be considered and assessed during the course of the consultation process.

12. **The indigenous requirement** should be reviewed to ensure there is no discrimination when compared to the requirements of the wider community in accessing social housing, i.e. it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers.

13. **An Environmental Health Framework:** Environmental and Climate Change considerations should be factored into the planning of Traveller Accommodation and include prioritised energy retrofits with new developments built to the highest energy standards with the newest energy technologies to address energy poverty.

14. **Play facilities** should be provided in Traveller specific accommodation in line with Action 61 in NTRIS¹.

15. **A Human rights-based Approach** to Traveller Accommodation to be implemented, including Anti-Racism Training for local authority staff and public representatives.

16. **A General Ethnic Identifier** should be used within the social housing application, as is best practice within a human rights framework, rather than a Traveller only question, and data should be collected specifically in each council for Travellers experiencing homelessness and reported via PASS.

17. **LTACC**: There is a need for each LTACC to have an independent chair. Each LTACC should produce an annual report, and have TAP as a standing item, including progress reports.

18. **Midterm review** of the Traveller Accommodation Programme should take into consideration the development of the future TAP Programme 2030-2034, with an awareness and understanding of future and projected need.

Traveller Accommodation Legal and Policy Obligations

Government commitment to Traveller accommodation is manifested under legal and policy instruments including The Housing (Traveller Accommodation) Act, 1998. The Act mandated Local Authorities

a) to deliver culturally appropriate accommodation in all its forms, including: halting sites, group housing schemes, standard houses and transient accommodation in the Republic of Ireland to Travellers.

b) establishment of Local Traveller Accommodation Consultative Committees, LTACCs, in each Local Authority area to advise on the provision and management of accommodation for Travellers.

*The Planning and Development Act 2000*², as amended, also requires that the land use aspects of TAPs should be reflected in the local authority's development plan. Under Section 10(2)(i) of the 2000 Act the development plan must include objectives for "the provision of accommodation for Travellers, and the use of particular areas for that purpose."

*Development Plan Guidelines 2007*³, was issued by the Minister under Section 28 of the 2000 Act, stipulating the approach of the development plan in addressing the accommodation needs of the Traveller community.

The Housing Need and Demand Assessment (HNDA), which emanates from the National Planning Framework (NPF), requires specifically, to address specialist needs categories including Traveller accommodation.

*The Programme for Government 2020*⁴, focused on ensuring that the accommodation needs of the Traveller community are met by local authorities and that capital funding programmes for such accommodation are drawn down and utilised.

*Housing for All 2021*⁵, has a remit to increase and improve the output of Traveller-specific accommodation, and a commitment by the Government to work with Local Authorities and AHBs.

*Land Development Agency Act 2021*⁶ under section Services to local authorities, 15 (1) (a) 'A local authority may request the Agency; to provide services to it in relation large scale, multi tenure or mixed-use development sites that may include sites that are fully or partially intended to secure the implementation of all or part of an accommodation programme, within the meaning of the Housing (Traveller Accommodation) Act 1998.

*The National Youth Homelessness Strategy*⁷, obligates councils to

- a) Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness'.
- b) Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness'.

*Moratorium Part 8*⁸ of the planning process The temporary time-limited moratorium on Part 8 of the planning process, January (2023) had a potential benefit for councils in the acceleration of Traveller specific projects.

Policy Reforms and Reviews since the TAP 2019-2024

*The Traveller Accommodation Expert Review 2019*⁹. The report sets out an integrated set of recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. These recommendations address four key themes: delivery reflecting need, planning, capacity and resources, and governance.

*The Irish Human Rights and Equality Commission Equality Review (2019)*¹⁰ The Commission invited 31 local authorities to undertake a review of their provision of Traveller accommodation and to conduct a review of the practices, procedures and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller-specific accommodation services.

The Office of the Planning Regulator conducted a Case Study Paper entitled *Traveller Accommodation and the Local Authority Development Plan 2021*¹¹, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.

Current Need

During the course of the current TAP 2019 – 2024, Ireland's housing crisis has grown to unprecedented levels. The demand on housing and social housing stock has accelerated, in November 2023, over 13,500 people were in emergency accommodation, including 4000 children.¹²

These figures would undoubtedly increase if they were to be based on the ETHOS definition of homelessness, which includes overcrowding and couch surfing. In December 2023, only 3% of rental accommodation was available through HAP¹³. The housing crisis has a disproportionate impact on Travellers, who already face discrimination when accessing private rental accommodation. Over 8,000 Travellers are in need of accommodation, including 2000 families in overcrowded or emergency provision, or roadsides. Additionally, 13% of all homeless adults nationally were Travellers¹⁴. As a comparator to national homeless findings (children and adults), this could equate to 1 in 5 Travellers as homeless, as a low estimate.

Social Housing Delivery Trends.

Delivery Rate Comparisons: 10,263 social homes were delivered in Ireland under Housing for All for in 2022 7,433 of these were new-build, 5,196 in 2021 and 5,073 in 2020. No Traveller specific builds were delivered under the Plan.

Comparing further for the 3-year period 2019-2022 of all local authority New builds with the rate of local authority Traveller new builds, nationally 5,771 units were built in 2019, in 2020 2,230 units and in 2021 1,998 units, a total of 9,999. For the same 3-year period only 44 units of Traveller accommodation were built by local authorities.¹⁵

Need for Traveller for Traveller Homelessness Task Forces.

National Homeless Action Committee (NHAC). There is no national audit or assessment of the need for Traveller homelessness. Homeless services and agencies do not collect Traveller data. Local authorities are responsible for the adoption of Homelessness Action Plans that address the challenges for all homeless people including Travellers, but an audit¹⁶ of local authority Traveller Accommodation Programmes (2014-2019) showed only some local collect data for those in Emergency or homeless accommodation, and 12 of the 31 did not record data with most deferring duty to homeless services. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces, and a central

Traveller Strategy with specific intersectional priorities based on disability, children, at risk of homelessness, single parenting and domestic violence.

Demographic trends since the last TAP

Population Data – The recent Census provides some suggestive baseline of community demographic patterns, however, is not a total count or assessment nationally. The rate of completion of the ethnic question by Travellers was enumerated in 2022 as 32,949 people¹⁷. The more accurate account is found in figures compiled by the Department of Housing / Local Authority annual estimates (November 2022) accounting for approx. 48,732 people working off a household size of 4.

The current Traveller family count nationally shows (2022)¹⁸ shows an increase of 381 families from the previous year. Further increases are found in the rate of overcrowding with an additional 79 Families Sharing (828 to 907) and (167 more families living on Unauthorised Sites (487 to 654). In total, culminating in a rate of need to approx. 3,500 people.

County trends indicate growth rates as follows: A population growth rate of 6% nationally, with the largest growth in Offaly (up 30%), Fingal (up 17%), Tipperary (up 17%), and Cork (up 11%). However, the number of Travellers enumerated in some counties fell between 2016 and 2022, including Longford (down 13%) and South Dublin (down 12%).¹⁹

Consultation

It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018²⁰ stated “It is essential that Traveller Accommodation Programmes are prepared in a consultative manner. The Act requires that housing authorities consult with adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Consultative Committee, other local Traveller representative groups, community and interest groups and the public in general. The purpose of broad consultation ensures that the interests of all concerned with or affected by proposals for Traveller accommodation are considered and to facilitate a planned and comprehensive response by housing authorities to the accommodation needs of Travellers’.

Consultation Process

We strongly recommend compliance of the National Traveller Accommodation Consultative Committee (NTACC) guidelines regarding Traveller consultation at local level and on LTACCs, in the preparation and implementation of TAPs and propose a timeframe to allow for consultation with community and their representative groups, within plans. Please see

Appendix A for Operation and membership of Local Traveller Accommodation Consultative Committee's (LTACCs) based on NTACC's Guidelines.

Under Section 42 (Appendix B) of the *Irish Human Rights and Equality Act 2014*²¹ all public bodies in Ireland, including Local Authorities, have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. This is a legal obligation, the Public-Sector Equality and Human Rights Duty.

Statement of Strategy

The 6th TAP should be bound by SMART principles, Specific, Measurable, Achievable, Relevant and Time bound. This should be stated within the strategy statement and be reflected within the TAP. This can be achieved through setting targets and timeframes for both the delivery of accommodation and for Traveller accommodation service improvements.

Assessment of Needs

We recommend that local Traveller organisations should be involved in carrying out the assessment of need. In the case where local Traveller organisations have developed their own assessments, the local authority needs to take these into consideration when compiling figures. The assessment of need must include for: Halting sites, Accommodation for Nomadic families- transient halting sites are relevant to the "annual patterns of movement of Travellers", so it must take account of nomadic families. The assessment must also take account of present and future needs during the lifetime of the programme.

Traveller Accommodation Expert Review July 2019²²

This report set out an integrated set of 32 recommendations intended to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community, which were established by the Housing (Traveller Accommodation) Act, 1998. The following recommendations are particularly relevant to the development of Traveller Accommodation Programmes.

Expert Review Recommendation A.8:

"Commission research on homelessness among Travellers and ensure that the particular accommodation challenges and preferences of this group are addressed in relevant strategies to combat homelessness."

To align with this policy objective, Local Authorities should submit the current number of Travellers in emergency accommodation and number registered as homeless.

Expert Review Recommendations (A.3a and 3b),

Information on Travellers currently accommodated in RAS, HAP and Rent Supplement funded dwellings. This would require the inclusion of an ethnic identifier in applications for these housing allowances and the collation of data currently recorded by the Department of Employment and Social Protection (in the case of Rent Supplement) and on each local authority's 'transfer list' (in the case of RAS and HAP).

b. An in-depth nationwide survey of the characteristics of the Traveller population, their location and accommodation, commissioned from an independent, expert provider. This survey would provide more detailed information on Travellers' mobility patterns, family formation, existing accommodation tenure and conditions, and future accommodation preferences. It could also be used to inform the ongoing review of the accuracy of the Social Housing Assessments, as recommended above.

Traveller Specific Accommodation

The Office of the Planning Regulator ²³ identified as best practice, the need for Local Authorities, in planning for Traveller accommodation to:

- Provide recognition of the cultural requirements of members of Travellers in regard to accommodation.
- Prioritise community integration, access to services and supporting cultural infrastructure associated with Traveller culture.

In relation to Traveller-specific accommodation (group housing schemes, halting sites and transient sites) developments planned the following should be identified:

- Timeline
- Number of units
- Site for development should be identified and mapped.
- Indicative budget requirements

Development of Transient Sites

The DHLGH Guidelines and Circular 35/2018 underpin the recommendation of reviewing evidence of the assessment basis and survey methodology used to determine the need for a transient site, and future proofing specific delivery targets for transient provision, which can be identified and mapped in both the TAP and the Development Plan. This is a statutory

obligation of the Traveller Accommodation Act 1998 Transient Accommodation should be provided simultaneously with the other types of accommodation.

Tenant Participation

The degree to which Travellers are involved in the development of accommodation options and supported to play a full and meaningful role in the management of such, is central to building and sustaining a successful Traveller Accommodation Strategy. Benefits of tenant participation include the generation of greater ownership within communities, resulting in tenants becoming more involved in the sustainability of their overall living environment; encourages dialogue between the housing authority officials and residents; moves the operational context from complaints to a plan of action based on need and develops an understanding of Traveller issues and builds new relationships between all involved.

Caravan Loan Scheme

We welcome the roll out of the Caravan Loan Scheme due for 2024 and recognise the hard work done to date. The Department confirm a review of the scheme will be conducted in 2024 and gives some reassurance to national and local Traveller organisations who continue to raise concerns about pace needed to meet the demand.

Fire Safety in Traveller Accommodation

The National Directorate for Fire and Emergency Management was mandated to lead and oversee at the national level a programme to review fire safety in local authority provided Traveller accommodation, following the tragic loss of life on 10th October, 2015 of ten members of an extended Traveller family living in local authority provided Traveller accommodation in Carrickmines, Dublin. Under direction from the NDFEM, local authorities undertook a major exercise aimed at enhancing fire safety in Traveller accommodation in 2015/16.

An update to the NTACC on Local Authorities Fire Safety Measures for the period 1st September 2016 – 31st August 2019 was published in May 2022. There have been no subsequent reports by local authorities. Fire safety must be prioritised by local authorities, with regular reports on safety measures published and updated fire safety training provided. Fire safety should be part of the ongoing work of The Local Traveller Accommodation consultative Committee (LTACC).

Proposed Checklist for development of Traveller Accommodation Programmes 2025 - 2029

Consultation	<ul style="list-style-type: none"> • Was there engagement with the LTACC, local Traveller organisations and stakeholders at all stages of the development of Traveller Accommodation programme? • Did the LTACC sign off on the original TAP?
Current Need	<ul style="list-style-type: none"> • What is the total of units / families in need? • What methodology was used to assess need and is this independently verifiable • Has current need been determined by accommodation type; differentiated across, Traveller specific accommodation, group housing schemes, transient sites, halting sites, HAP/RAS, standard social housing, Approved Housing Bodies, single instance/one off rural housing. • What methodology was used to assess Traveller need for accommodation preferences? • with a narrative on reasons for delay or amendments.. (not sure what that is) • Has need increased or changed since the TAP was drawn up and targets now in need of revision?
Future and Projected Need	<ul style="list-style-type: none"> • What is the total number of units / families in future need by accommodation type per year and delivery planned across each type per year? • Is increased growth reflected, where need has outgrown the original assessment and are indicators of measurement detailed to support figures?
Recognition of Culture	<ul style="list-style-type: none"> • Does the TAP identify the Council's statutory obligation under the Public Sector Duty to eliminate discrimination and promote equality? • Have the cultural needs of Travellers been considered and assessed? • Indigenous Requirement and Local Connection Rule • If the TAP references an indigenous requirement, has this been reviewed to ensure there is no discrimination when compared to the requirements of the wider

	community in accessing social housing, i.e. where it should be discretionary, rather than conclusive, to prevent potentially unlawful discrimination against Travellers
Homelessness	<ul style="list-style-type: none"> • Are figures provided on numbers of Travellers / families in homeless accommodation?
Budget and Planning	<ul style="list-style-type: none"> • Are timelines, site locations, target units and budgets identified for Traveller specific accommodation projects and have progress updates on each been provided? • Have these been mapped (or now amended to be) in line with the recommendations of the OPR report, in both the TAP and the Development Plan? • Have transient sites been assessed and planned for?

Appendices

Appendix A

Summary of Requirements for the Traveller Accommodation Programmes Provided in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029²⁴

- The Minister has, under section 6(1) of the 1998 Act, directed that relevant housing authorities for the purposes of preparing a Traveller Accommodation Programme in the functional area concerned, make an assessment of the accommodation needs of Travellers who are assessed under S.20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites.
- The Minister has given a direction under section 6(5) of the 1998 Act, specifying that relevant housing authorities shall make an estimate of the projected accommodation needs of Traveller families arising during the duration of the programme (1 January 2025 to 31 December 2029).
- Under section 10(2)(b) of the Act the Minister has directed that the information in relation to the needs to be met by the programmes shall be in summary form but in sufficient detail to show the needs for all categories of Traveller accommodation and the general area in which the accommodation is required.

- The Minister has directed under section 10(2) of the 1998 Act that annual targets be included in the programmes in respect of the implementation of the programmes. The targets should include details of the numbers of units of accommodation proposed to be delivered for each of the five years of the programme for Traveller specific accommodation (group housing, bays on halting sites, including transient sites) both new and refurbished and for standard housing.
- Under section 7(4) of the Act the Minister has specified 31 December, as the latest date by which accommodation programmes must be adopted.
- The Minister has, under section 10(1) of the 1998 Act, directed that the next accommodation programme should be for a period of 5 years and that the programme shall begin on the 1st of January 2025.
- The Minister has, under section 17(1) of the 1998 Act, directed that a review of the next accommodation programme should be carried out no later than 30th June 2027.

Appendix B

Operation and membership of Local Traveller Accommodation Consultative Committee's (LTACCs)

The following recommendations are based on the NTACC's Guidelines.

1. LTACCs are to advise the appointing authority in relation to: The provision and management of accommodation for Travellers.
2. Nomination procedures need to be inclusive and transparent and Traveller representatives appointed should be positioned to represent the overall Traveller population in each area. In areas where local Traveller accommodation organisations exist, these groups should nominate their own representatives, where local groups do not exist, national Traveller organisations should be a point of reference to local authorities.
3. The preparation and implementation of any accommodation programme for the functional area of the appointing local authority. The issue of management of Traveller accommodation and discussion of individual accommodation cases, should not feature within the scope of the work of LTACCs.
4. Operation practice: LTACCs should meet a minimum of 4 times a year, as laid out. In accordance with the Housing Traveller Accommodation Act 1998 and NTACC guidelines. The Director of Services should report in person to every meeting of the LTACC.
5. The overall objective of the LTACCs is to ensure Traveller Accommodation Programmes are implemented in full. In order for this to happen LTACCs should embed annual monitoring indicators offset against TAP annual targets and its own work plan. Process, as well as delivery, should be monitored by the LTACC.
6. The LTACC should produce an Annual Report including a summary of activities in the period. Copies of this Report should be given to the appointing Local Authority as well as a copy sent to the National Traveller Accommodation Consultative Committee.

7. The LTACC should formally report to the appointing Local Authority Manager & Director of Services twice a year. The Manager and Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACCs Annual Report.
8. LTACCs are crucial to the success of TAPs. In cases where LTACCs are not functioning the national accommodation officer of the ITM are available to assist.
9. Ensure 'Memorandums of understanding' to inform the work practices of LTACC's and ensure an effective and pragmatic approach to working in partnership with positive duty obligations as per Section 42 of the IHREC Act (2014) for members of the LTACC.

Appendix C

Irish Human Rights and Equality Commission Act 2014, S.42

Public bodies

42. (1) A public body shall, in the performance of its functions, have regard to the need to—
- (a) eliminate discrimination,
 - (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
 - (c) protect the human rights of its members, staff and the persons to whom it provides services.
- (2) For the purposes of giving effect to subsection (1), a public body shall, having regard to the functions and purpose of the body and to its size and the resources available to it—
- (a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and
 - (b) report in a manner that is accessible to the public on developments and achievements in that regard in its annual report (howsoever described).
- (3) In assisting public bodies to perform their functions in a manner consistent with subsection (1), the Commission may give guidance to and encourage public bodies in developing policies of, and exercising, good practice and operational standards in relation to, human rights and equality.
- (4) Without prejudice to the generality of subsection (3), the Commission may—
- (a) issue guidelines, or
 - (b) prepare codes of practice in accordance with section 31,
- in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.
- (5) Where the Commission considers that there is evidence of a failure by a public body to perform its functions in a manner consistent with subsection (1) and that it is appropriate in all the circumstances to do so, the Commission may invite the public

body to—

(a) carry out a review in relation to the performance by that body of its functions having regard to subsection (1), or

(b) prepare and implement an action plan in relation to the performance by that body of its functions having regard to subsection (1),

or both.

(6) A review or an action plan under subsection (5) may relate to—

(a) equality of opportunity or human rights generally, or

(b) a particular aspect of human rights or discrimination, in the public body concerned.

(7) The Commission may, and, if requested by the Minister, shall, review the operation of subsection (1).

(8) For the purposes of assisting it in carrying out a review under subsection (7), the Commission shall consult such persons or bodies as it considers appropriate.

(9) Where the Commission carries out a review under subsection (7) it—

(a) may, or

(b) where the Minister has requested the review, shall, make a report of the review to the Minister and any such report shall include such recommendations as the Commission thinks appropriate.

(10) The Commission shall cause a copy of the report to be laid before each House of the Oireachtas.

(11) Nothing in this section shall of itself operate to confer a cause of action on any person against a public body in respect of the performance by it of its functions under subsection

References

¹<https://www.gov.ie/pdf/?file=https://assets.gov.ie/43310/d7d54fbff0f4418982856e7dddaf78c1.pdf#page=null>

²Government of Ireland, The Planning and Development Act 2000, Dublin: Dublin Stationery Office <https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html>

³<https://www.google.com/url?q=https://www.gov.ie/en/publication/225d8-development-plan-guidelines/&sa=D&source=docs&ust=1707408247122472&usg=AOvVaw239y7uBQNF2EVARxdgxTFj>

⁴ <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

⁵ <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

⁶ <https://www.irishstatutebook.ie/eli/2021/act/26/enacted/en/html>

⁷ <https://www.gov.ie/en/publication/69597-youth-homelessness-strategy/>

⁸<https://www.gov.ie/en/press-release/6ab3a-government-counter-motion-on-the-private-members-business-motion-re-eviction-ban/>

⁹<https://www.housingagency.ie/publications/traveller-accommodation-expert-review-2019>

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- ¹⁰<https://www.ihrec.ie/our-work/equality-review/#:~:text=In%202019%2C%20the%20Commission%20invited,obligations%20on%20Traveller%20specific%20accommodation.>
- ¹¹<https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
- ¹²<https://www.irishtimes.com/ireland/social-affairs/2024/01/05/number-of-people-in-emergency-accommodation-hits-new-high-of-13514/>
- ¹³<https://www.simon.ie/e-publication/locked-out-executive-summary-december-2023/>
- ¹⁴ [https://fra.europa.eu/en/publication/2020/roma-travellers-survey\(2020\)](https://fra.europa.eu/en/publication/2020/roma-travellers-survey(2020))
- ¹⁵<https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/#local-authority-build>
- ¹⁶<https://itmtrav.ie/wp-content/uploads/2021/08/PDF-ITM-Traveller-Accommodation-Programme-Analysis.pdf>
- ¹⁷<https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- ¹⁸<https://www.gov.ie/pdf/?file=https://assets.gov.ie/276539/9248d855-1f03-42c3-be31-def188fdf7a8.pdf#page=null>
- ¹⁹<https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- ²⁰<https://www.wicklow.ie/Portals/0/Documents/Housing/Traveller-Accommodation/Circular%20Housing%20%2035.2018%20%20%20%205th%20Traveller%20Accommodation%20Programme%202019%20-%202024.pdf>
- ²¹ Government of Ireland, Irish Human Rights and Equality Commission Act 2014, S.42, Dublin: Dublin Stationery Office.
- ²²<https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>
- ²³<https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
- ²⁴ DHLGH (2023) *Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029*



**National Traveller MABS Submission
to the preparation of the
Traveller Accommodation Programme 2025 – 2029**

February 2024

About National Traveller MABS

National Traveller MABS, established in 2005, is a leading advocate for the financial inclusion of Travellers in Ireland.

National Traveller MABS works to reduce poverty, discrimination and the financial exclusion of Travellers. We work with the Traveller community and organisations to change policy and practice which impacts Travellers financially.

Our work involves helping Travellers access MABS and Citizens Information services, community education, research, and policy development.

National Traveller MABS works to end the financial exclusion of Travellers in Ireland by:

- Promoting and developing culturally appropriate financial education programmes.
- Supporting the development of a collaborative working relationship between local MABS, local Travellers and other relevant organisations.
- Working with partner organisations to address exclusion by developing alternatives to mainstream saving and borrowing
- Highlighting issues of over-indebtedness and exclusion from financial institutions, making appropriate responses through our research and policy work

In the past National Traveller MABS has supported Travellers in accessing culturally appropriate accommodation through a number of successful Caravan Loan Guarantee Schemes. A 2015 review of these schemes made a number of recommendations that may inform the provision of similar schemes¹. In 2018 we also undertook a study into the cost of mobile home/trailers. This study also made a number of recommendations in relation to the provision of fuel efficient affordable culturally appropriate accommodation². In 2022 we undertook further research in collaboration with Atlantic University Sligo into the energy

¹ National Traveller MABS, *A Review of National Traveller MABS Supported Caravan Loan Guarantee Schemes*, (Dublin, 2015) <https://www.ntmabs.org/publications/policy/2015/a-review-of-national-traveller-mabs-supported-caravan-loan-guarantee-scheme.pdf>

² Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

efficiency of mobile homes and made further recommendations on providing energy efficient culturally appropriate homes³. We have also written an outline for a trailer rental scheme which we believe should run alongside the trailer loan scheme to give families the opportunity to live in residential standard, energy efficient homes regardless of their income⁴.

Local authorities have an integral role to play in ensuring the financial inclusion of Travellers through the development of the Traveller Accommodation Programme by ensuring that accommodation needs of Travellers in their area are properly addressed in a manner that is both equitable and culturally appropriate.

Throughout this submission when we use the word trailer we are referring to a caravan/mobile home. Trailer is the preferred term used by Travellers.

³ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

⁴ National Traveller MABS, *Proposal for a National Caravan Rental Scheme - The case for an alternative*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

Recommendations for the Traveller Accommodation Programme 2025-2029

- **That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.**
- **That the trailer loan amount on offer should be increased to between €60,000 and €80,000.**
- **That Traveller Accommodation Programmes introduce a caravan rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.**
- **National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.**
- **Local authorities should facilitate energy efficiency information initiatives for Travellers living in mobiles.**
- **Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.**
- **That a full and robust consultation with the Traveller community in the local authority's area take place.**
- **That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.**

- **The local authority should ensure that equality reviews be adapted into the Traveller Accommodation Programme as per the IHRC recommendation.**

DRAFT

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The provisions of the *Housing (Traveller Accommodation) Act 1998 Act* provide for public input and consultation at all stages of the preparation and implementation of Traveller Accommodation Programmes. Please find listed below National Traveller MABS recommendations for the Draft Traveller Accommodation Programme 2025-2029:

Trailer Loan Scheme

National Traveller MABS is aware that local authorities, supported by the Department of Housing have reintroduced the trailer loan scheme on a pilot basis over the past number of years. We welcome this support of Travellers in accessing credit to purchase trailers.

National Traveller MABS recommends that all local authorities should have an easily accessible application process. This would involve:

- Advertising the scheme on the local authority website, making the local Traveller organisation(s) aware that the scheme is in operation, ensuring the local LTACC is aware the scheme is operating and advertising the scheme in local papers to ensure the community know the scheme is operating.
- Making application forms and scheme details available online as is the case with all other social housing schemes.
- Deadlines for applying for the scheme should be clearly advertised on the local authority's website.
- Application forms and information about the schemes should follow NALA's Plain English guidelines to ensure that they are understood. 1 in 4 adults in Ireland have a literacy difficulty and this number is significantly higher in the Traveller community.
- Signposting all potential applicants towards engagement with money management support services such as their local MABS office. It should be the decision of the potential applicant as to whether they choose to engage with MABS but they should be made aware that the service is available to them should they want it.

- Making provision for repayments to be deducted at source, subject to protected income considerations. The Household Budget Scheme would be the preferred mechanism for social welfare reliant applicants.

Recommendation: That local authorities incorporate an accessible and transparent application process and should signpost all potential applicants to their local MABS for free independent financial advice as well as providing a deduction at source mechanism for repayments.

The funding allocated for the scheme is often insufficient to meet the needs of the Traveller community, leading to the creation of long waiting lists and delays in families being able to access loans. The maximum loan amount available under the current scheme is €40,000. Research carried out by National Traveller MABS in conjunction with Atlantic University Sligo in 2023 found that trailers that conform to British Standard BS 3632, which mean the trailer is suitable for year round living and conforms to energy efficient status begin at €60,000. This price does not include disposal, installation, delivery and associated charges which can add another €10,000 to the price of the trailer.

Furthermore the purchasing power of the loan has been weakened as suppliers may increase prices of units when they know that the purchaser is buying under the scheme. These combined factors mean many families who have availed of the scheme are purchasing substandard trailers, not suitable for year round living, which are not energy efficient and which will have a limited lifespan. To offset these problems National Traveller MABS would recommend increasing the loan amount increased.

Recommendation: That the trailer loan amount on offer should be increased to between €60,000 and €80,000.

Trailer Rental Scheme

Our recent research study into the cost of trailers found a range of trailers on offer ranging from €15,000 to over €100,000. However a residential standard trailer, one which is suitable for year round living and which conforms to the British Standard BS3626.2015 began at €60,000 for a two berth trailer. Residential standard trailers, as opposed to units used as holiday homes, are more fuel efficient and provide families with a better quality of accommodation. We acknowledge and know that some Traveller families on low incomes will not be in a position to purchase a residential standard trailer or qualify for the trailer loan scheme and this is feedback we have received from MABS money advisors and from local authorities during the current iteration of the trailer loan scheme. A rental scheme would ensure that Traveller families would be able to access good quality affordable accommodation. Our recent publication has called for and outlined how a trailer rental scheme could operate and could offer benefits to both families and the local authority and Government⁵.

Recommendation: That Traveller Accommodation Programmes introduce a trailer rental scheme for families who are not in a position to finance the purchase of a residential standard trailer.

Addressing fuel poverty

National Traveller MABS is concerned with the reduction and elimination of fuel poverty in the Traveller community. Fuel poverty arises out of the relationship between household income, energy efficiency of the dwelling and fuel prices and is an acute problem for low income groups in particular. Households are deemed to be in fuel poverty when they spend 10% or more of their income on fuel⁶.

⁵ Proposal for a National Caravan Rental Scheme - The case for an alternative
<https://www.ntmabs.org/publications/education/2022/caravan-rental-scheme.pdf>

⁶ McAvoy, H. All Ireland Paper on Fuel Poverty and Health, (Dublin, Institute of Public Health in Ireland, 2007)

Research carried out by National Traveller MABS in 2019 found that 77% of Travellers living in trailers were living in energy poverty due to the poor insulation and lack of energy efficient measures⁷. A follow up study carried out in 2022 showed that a large majority of the Traveller families living in trailers surveyed ($\approx 75\%$) were paying between €120 - €360 on electricity, and €105- €400 on heating fuels (i.e. gas, coal wood) on a monthly basis⁸. The energy expenditure estimates from the survey carried out in this research were similar to that in the 2019 report showing that there has not been any significant improvement in reducing energy costs for Travellers living in trailers in the intervening years. The data was collected prior to the energy crisis price increases so we can safely assume that those figures have increased even further in the past two years.

National Traveller MABS research has clearly demonstrated that no residential standard trailers are less fuel efficient than those manufactured to a residential standard and the vast majority of trailers being lived in in Ireland are not residential standard. These trailers cost a huge amount to heat and it is virtually impossible to retain heat once the heat source is extinguished due to lack of insulation and double glazing. This therefore has implications for household expenditure and fuel poverty.

Recommendation: National Traveller MABS recommends that all local authorities support Travellers to access residential standard trailers and that all units provided to Travellers by the local authority be residential standard.

Local authorities in conjunction with SEAI and the Department of Climate and Communications and the Department of Housing Local Government and Heritage should facilitate energy efficiency information initiatives for Travellers living in trailers. This will start with modest targeted efforts and will hopefully produce a track record of success by focusing on accessible energy efficiency measures (i.e. the use of LED lights) that would contribute to reduced energy spend⁹. This could be achieved by employing and training

⁷ Stamp, Stuart, & Kearns, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

⁸ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

⁹ IBID

Travellers in each local authority area to act as trusted energy champions within the Traveller community. These energy efficiency information initiatives should be included in the Traveller Accommodation Programme as they should be offered in conjunction with any retrofitting that is being carried out to Traveller accommodation in the local authority area.

Recommendation: Local authorities should facilitate energy efficiency information initiatives for Travellers living in trailers.

There is a need for more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers¹⁰. Local authorities are in a prime position to be at the forefront of these initiatives. With 77% of Travellers in trailers living in energy poverty in 2019 we know that the situation has only gotten worse over the intervening years¹¹. As part of retrofitting of Traveller specific accommodation and when planning new sites consideration should be given to the installation of green energy technologies. These could include the installation of wind turbines on sites which would have the potential to power the entire halting site, removing the need for commercial electricity and also allowing for the local authority to be able to sell energy back into the national grid. Another potential solution could be planning for the installation of solar panels on halting sites. Currently there are issues with installing panels on halting sites due to the tight dimensions of the bays and regulations regarding the closeness of structures to fire walls etc. With a little foresight and sound technological advice from technical experts in SEAI as well as grants from SEAI community funds etc. local authorities are uniquely positioned to be at the forefront of incorporating green technologies into Traveller specific accommodation as well as addressing and reducing fuel poverty among the community.

Recommendation: Local authorities should include more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers in the Traveller Accommodation Programme.

¹⁰ National Traveller MABS, *Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities*, (Dublin, 2023) <https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

¹¹ Stamp, Stuart, & Keams, Michelle, *Accommodating Ethnicity Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers*, (Dublin, 2019) <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

Community Consultation

Community consultation is important for local authorities in drawing up a Traveller Accommodation Programme in Ireland for several reasons:

1. **Inclusivity:** Community consultation ensures that all stakeholders, including members of the Traveller community, have a voice in the decision-making process. This helps to create a more inclusive and representative programme that meets the needs of all residents.
2. **Transparency:** Consulting with the community helps to build trust and transparency in the decision-making process. It allows residents to understand the rationale behind decisions and provides an opportunity for feedback and input.
3. **Local knowledge:** Local residents often have valuable insights and knowledge about the needs and preferences of the Traveller community in their area. Consultation helps to tap into this local knowledge and ensure that the programme is tailored to the specific needs of the community.
4. **Legal requirements:** Local authorities in Ireland are legally required to consult with residents and stakeholders when developing Traveller Accommodation Programmes. Failure to consult can lead to legal challenges and delays in the implementation of the programme. Circular 35/2018 emphasizes the importance of local authorities working closely with representative bodies of the Traveller community.

Overall, community consultation is essential for promoting accountability, legitimacy, and effectiveness in the development of Traveller Accommodation Programmes in Ireland. It helps to ensure that the programme is well-informed, inclusive, and reflective of the needs and aspirations of all residents.

Recommendation: That a full and robust consultation with the Traveller community in the local authority's area take place.

Public Sector Duty

In Ireland, the public sector duty is a legal obligation placed on public bodies to promote equality and prevent discrimination in the delivery of their services. This duty is outlined in the Irish Human Rights and Equality Commission Act 2014 and applies to all public bodies in Ireland, including government departments, local authorities, and state agencies.

One area where the public sector duty is particularly relevant is in relation to the provision of Traveller accommodation. Travellers are an ethnic minority group in Ireland who have a specific accommodation need due to their nomadic and traditional way of life. Under the Housing (Traveller Accommodation) Act 1998, local authorities have a statutory obligation to provide adequate and appropriate accommodation for Traveller families.

In implementing the Traveller Accommodation Programme, public bodies are required to ensure that they are promoting equality and preventing discrimination against Travellers in the planning, design, and provision of accommodation services. This includes consulting with Traveller communities, ensuring that Traveller-specific needs are met, and taking measures to address any inequalities or barriers that may exist.

The public sector duty also requires public bodies to monitor and review their policies and practices to ensure that they are compliant with equality and human rights legislation. Failure to comply with the duty can result in legal action and potential sanctions.

Overall, the public sector duty in Ireland plays a crucial role in ensuring that Travellers are able to access adequate and appropriate accommodation that meets their specific needs and respects their rights as an ethnic minority group and it is imperative that it is taken into consideration in the Traveller Accommodation Programme.

Recommendation: That the Public Sector Duty be fully embraced by local authorities in the drawing up of the Traveller Accommodation Programme.

Equality Reviews

The lessons learned from the IHRC equality reviews should be adapted into the TAP to . The Irish Human Rights and Equality Commission is an independent statutory body in Ireland tasked with promoting and protecting human rights and equality. The Commission has highlighted the importance of equality reviews in assessing and improving Traveller Accommodation Programmes across Ireland. In a report published in 2021, the Commission highlighted the ongoing inequality and marginalisation faced by the Traveller community in accessing suitable and adequate accommodation¹².

The Commission emphasized the need for effective monitoring and evaluation of Traveller Accommodation Programmes to ensure that they meet international human rights standards and effectively address the needs of the Traveller community. The Commission called for a rights-based approach to be adopted in the development and implementation of these programmes, with a focus on ensuring the meaningful participation and consultation of Travellers in decision-making processes.

The Commission's stance on equality reviews and Traveller Accommodation Programmes is that they are essential tools in advancing human rights and equality for the Traveller community in Ireland.

Recommendation: The local authority should ensure that the learning from the equality reviews be adapted into the Traveller Accommodation Programme.

¹² IHRC, *Accounts of First Council-by-Council Equality Review on Traveller Accommodation in History of State Published* <https://www.ihrec.ie/accounts-of-first-council-by-council-equality-review-on-traveller-accommodation-in-history-of-state-published/>



IRISH COALITION TO END YOUTH HOMELESSNESS

The Irish Coalition to End Youth Homelessness, established in September 2017, consolidates the work of different organisations who work in the areas of youth, housing and homelessness,¹ and is a member of the Steering Group established by the Department of Housing, Local Government and Heritage to oversee the implementation National Youth Homelessness Strategy 2023-25.

The Housing (Traveller Accommodation) Act 1998 Act provides for public input to, and consultation on the preparation and implementation of Traveller Accommodation Programmes.

The Irish Coalition to End Youth Homelessness calls on each Local Authority in the preparation of Traveller Accommodation programmes to ensure recognition of youth homelessness, in line with national policy under Housing for All, and the National Youth Homelessness Strategy 2023-25. The Youth Homelessness Strategy identifies young members of the Traveller community as a cohort of heightened vulnerability to youth homelessness.

In relation to Traveller Accommodation Programmes, the Youth Homelessness Strategy requires each Local Authority to include specific actions in future Traveller Accommodation Programmes to address youth homelessness.²

Recommendations for the Development of the Traveller Accommodation Programme 2025 – 2029

The Coalition also highlights the below related actions under the Youth Homelessness Strategy for which Local Authorities are named owners/ co-owners.

- Develop and implement homelessness prevention programmes for young people.³
- Enhance connectivity between local authorities and Tusla, to ensure that appropriate supports can be provided.⁴
- Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness.⁵
- Ensure the specific inclusion of young people in Regional Homelessness Action Plans, with consideration given to those who have been identified in the Strategy as vulnerable cohorts.⁶
- Establish Youth Tenancy Support Programmes.⁷

Ensuring the connection between national, regional and local policies in relation to housing and homelessness, these actions should be considered by each Local Authority in the preparation of Traveller Accommodation Programmes to ensure comprehensive determination of need, and provision of appropriate support to meet this need.

¹ The Coalition comprises of; Barnardos, Belong To, Clúid Housing, Cope Galway, Crosscare, Depaul, EPIC, Focus Ireland, Foróige, Irish Traveller Movement, National Youth Council of Ireland, Novas, Peter McVerry Trust, Simon Communities, Society of Saint Vincent de Paul, Spunout, Teen Parent Support Programme, Threshold, Union of Students in Ireland.

² National Youth Homelessness Strategy Action 21: Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness.

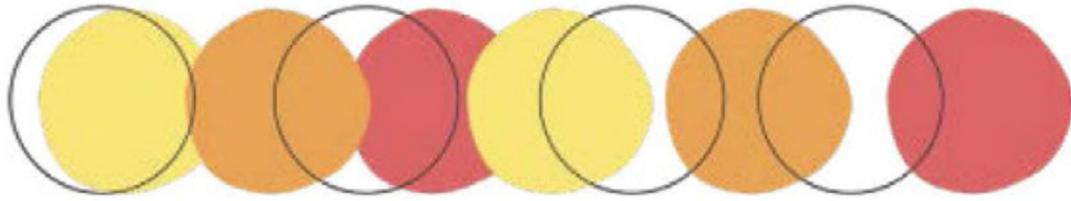
³ Action 2.

⁴ Action 4.

⁵ Action 8.

⁶ Action 15.

⁷ Action 23.



South Dublin County Council

Travellers Accommodation Programme 2025-2029

Stakeholder Consultation Report



May 2024



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Introduction

The Housing (Traveller Accommodation) Act 1998 requires all Local Authorities to prepare and adopt a Traveller Accommodation Programme (TAP) for each 5 year period. As part of the development process for their Traveller Accommodation Programme 2025-2029, South Dublin County Council (SDCC) employed Connect the Dots to carry out focus groups with members of the local Travelling community. The purpose of these groups was to build a comprehensive picture of the existing and projected housing needs of Traveller families living in the South Dublin area, and to ensure the TAP for 2025-2029 is designed in consultation with the Travelling community it aims to support.

Three focus groups were held in April 2024, in collaboration with Clondalkin Travellers CDP and Tallaght Travellers CDP. Anonymised findings from these groups are outlined in the following report. **All findings in this report only represent the views of the 14 people who attended these focus groups, and as such cannot be considered to represent the views of all Travellers living in the area.** However, their insights should provide a useful starting point for the development of the SDCC TAP 2025-2029.

Background Context

The Travelling community in Ireland face high levels of discrimination and inequality across all aspects of life. Results from a 2019 EU survey of Roma and Travellers¹ indicated that 45% of Travellers in Ireland felt discriminated against in the previous year, with overall discrimination levels (when looking for work, health, housing or other services) at 65%, one of the highest levels in all countries included in the survey². In relation to accommodation specifically:

- 92% of Irish Travellers felt there are not enough places, particularly Traveller specific accommodation, for them to live.³
- 56% face overcrowding in their accommodation⁴. Only 45% have enough beds for everyone in the household⁵.
- Over 33% report living in 'very unhealthy' and 'very unsafe' homes⁶
- Travellers make up 9% of the homeless population, despite representing less than 1% of the total population⁷

In 2017, Travellers were granted official recognition as an ethnic minority by the Irish state, an important step in addressing the discrimination and inequalities faced by the community. This recognition reflects wider policy shifts in recent years, to an approach of inclusion rather than integration. This recognises the distinct cultural needs and norms of the Travelling community. The National Traveller and Roma Inclusion Strategy 2017-2021 relates this to accommodation in its objective on the provision of 'accessible, suitable and culturally appropriate accommodation' for Travellers.⁸

Several human rights groups have outlined issues in state owned Traveller accommodation including overcrowding, pest infestation, lack of basic facilities on sites, inadequate

¹ Travellers in Ireland - Key Results from the Roma & Travellers Survey - FRA, 2019

https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-roma-and-travellers-survey-country-sheet-ireland_en.pdf

² ibid

³ ibid

⁴ Discrimination and Inequality in Housing in Ireland – IHREC, 2022

<https://www.ihrec.ie/app/uploads/2022/08/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

⁵ ibid

⁶ ibid

⁷ ibid

⁸ National Traveller and Roma Inclusion Strategy 2017 – 2021

<https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

sanitation and waste disposal and high rates of related health issues^{9, 10, 11}. There has also been a consistent underspend of allocated budget for Traveller accommodation. The reasons for this are complex, and include external factors including opposition from local settled communities and difficulties acquiring suitable land¹².

The provision of suitable accommodation for Travellers in Ireland is a complex issue that the Irish government has grappled with since the founding of the state. The Housing (Traveller Accommodation) Act of 1998 is a comprehensive framework that continues to guide national and local responses to the issue. It is widely considered to have enabled the delivery of large amounts of accommodation for Travellers in the intervening years, however it has fallen significantly short of providing for the full needs of the community¹³.

An implementation gap between national government and Local Authorities has been identified as a key issue in the delivery of sufficient and suitable Traveller accommodation. The Traveller Accommodation Expert Review 2019¹⁴ highlights an inadequate connection between the requirements laid out for Local Authorities (LA) in the Housing (Traveller Accommodation) Act 1998 and the realities of the planning process, and lack of guidance and evaluation for LAs on the implementation of TAPs. An independent audit by the Irish Traveller Movement in 2020¹⁵ similarly noted a lack of standardised approach to needs assessment across LAs and a lack of tangible targets as a key issue to be addressed for future TAPs. Calls have been made for more robust monitoring and reporting on implemented plans from many bodies, including the DCEDIY¹⁶, the DHLGH¹⁷ and the Office of the Planning Regulator¹⁸.

⁹ Discrimination and Inequality in Housing in Ireland – IHREC, 2022

https://www.ihrec.ie/app/uploads/2022/08/Discrimination-and-Inequality-in-Housing-in-Ireland_.pdf

¹⁰ National Traveller and Roma Inclusion Strategy 2017 – 2021

<https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021>

¹¹ No End in Site, An Investigation into living conditions of children on LA halting site - Ombudsman for Children, 2021 <https://www.oco.ie/app/uploads/2021/05/No-End-in-Site-FINAL-.pdf>

¹² Research Into the Barriers to the Provision of Traveller Accommodation - NTACC, 2018

<https://www.gov.ie/en/publication/64d47-national-traveller-accommodation-consultative-committee/>

¹³ Traveller Accommodation Expert Review – Expert Group, Dept of Housing, 2019

<https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>

¹⁴ibid

¹⁵ Review of National Traveller Accommodation Programmes 2019-2014 - Irish Traveller Movement, 2020

<https://itmtrav.ie/wp-content/uploads/2020/07/PDF-ITM-Traveller-Accommodation-Programme-Analysis.pdf>

¹⁶ National Traveller and Roma Inclusion Strategy 2017 – 2021

<https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

¹⁷ Traveller Accommodation Expert Review – Expert Group, Dept of Housing, 2019

<https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>

¹⁸ OPR Case Study Paper CSP03 - Traveller Accommodation and the Local Authority Development Plan – 2021

Methodology

Outreach

Outreach was conducted through Tallaght and Clondalkin Local Traveller Community Development Projects located in the county. Flyers were developed and distributed in both written and audio (via WhatsApp) formats to ensure the information was accessible to as many people as possible.

Participants

A total of 14 participants attended the three workshops, with a mix of genders. Participants came from various accommodation types including Halting Sites, Group Housing and Standard Housing and lived across various locations in the South County Dublin area. Participants attributed the low level of participation to a general lack of trust in the Council and a sense of fatigue among Travellers, stemming from their experiences of advocating for changes to their accommodation without seeing any tangible results.

Focus Groups

Focus groups took place at the following locations and times:

- 18th April 2024, 11am @ Clondalkin Travellers Development Group, D22 YY51
- 24th April 2024, 11am @ Tallaght Travellers CDP, D24 YW80
- 24th April 2024, 7.30pm @ Tallaght Travellers CDP, D24 YW80

Participants were guided through a discussion guide that covered;

- 1) Current Accommodation,
- 2) Exploring Accommodation Preferences and Needs,
- 3) Information on Families and Supports and
- 4) Future Consultation Process.

<https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>

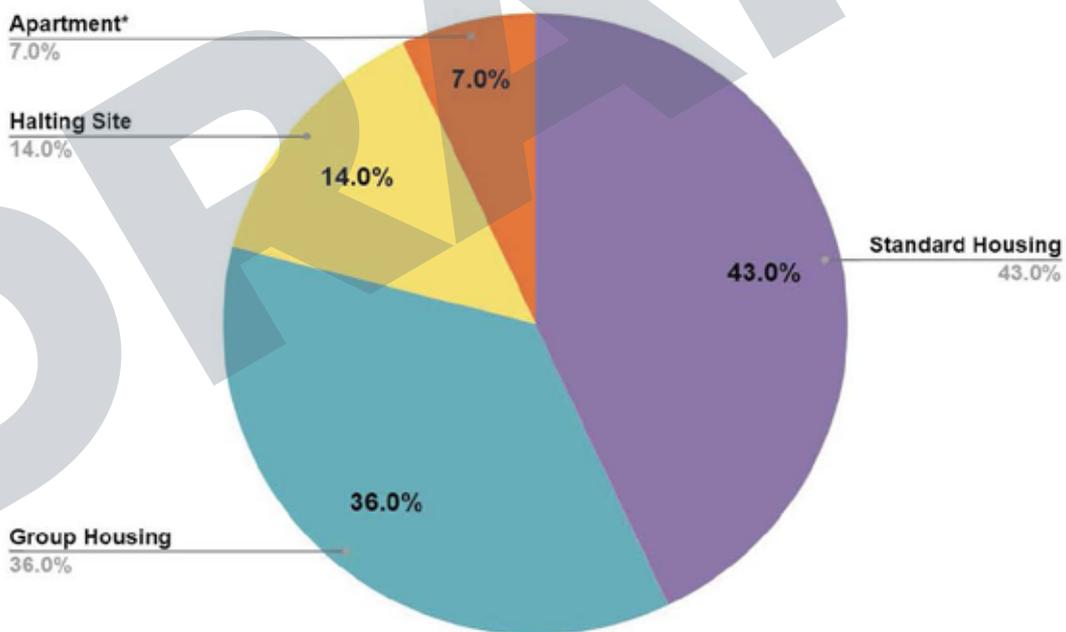
All participant feedback was given verbally and recorded by note-takers, to eliminate any potential barriers to participation. The detailed discussion guide can be found in Appendix X. The majority of participants indicated during the sessions that they had never previously been involved in such a workshop. Some participants had previous consultation experience through their involvement in the Local Traveller Accommodation Consultative Committee (LTACC) in previous decades (ranging from the 1990s onwards).

Summary of Results

The following section contains a summarised account of the collated discussions of each workshop, organised under each thematic issue outlined in the discussion guide.

Current Accommodation

Summary of Housing Types Among Participants



*Apartment rented with HAP

n=14 participants

Challenges in Current Living Situations

Lack of Accountability and Maintenance

- Many participants highlighted their perception of a lack of accountability from authorities regarding maintenance issues. Examples include poor quality of housing materials, unaddressed repairs, and a lack of facilities for disabled residents.
- Basic infrastructure like footpaths, green spaces, and fire safety measures were noted as lacking by participants
- Participants reported that in their experiences, maintenance requests are often ignored or inadequately addressed, leading to ongoing safety and comfort issues.

Discrimination and Inadequate Housing Options

- Travellers face stigma and racism, including issues with renting private accommodation and being unable to keep caravans or horses on rented properties. This discrimination exacerbates housing challenges.
- There is a significant issue with discrimination in the private rental market, where landlords refuse to rent to Travellers or accept Housing Assistance Payments.
- Single individuals and those without dependents struggle to access suitable housing, facing both systemic and individual discrimination.

Inadequate Facilities and Poor Living Conditions

- Participants felt that halting sites and group housing often lack essential facilities, and where facilities do exist there is insufficient maintenance.
- A significant concern for participants is the lack of disability access in halting sites, with no ramps or walk-in showers available for those with mobility issues. Unsafe flooring and inadequate sanitary facilities were also noted.
- Additionally, participants believed existing bays and sites do not meet current fire safety standards, leading to unsafe living conditions.
- Participants noted that steel units are often too small and not suitable for living, highlighting the need for more appropriate housing structures.
- Current living conditions in some sites were felt to be inadequate, with issues such as fumes, dampness, cold, and safety concerns being prevalent.

Overcrowding and Space Issues

- Many families face overcrowding, with inadequate space leading to stressful living conditions. A family of five in a two-bedroom apartment reported feeling "squashed."
- This leads to mental health issues and conflicts within families due to the cramped conditions.
- There is a significant need for more spacious and adequately sized housing options to accommodate larger families.

Lack of Culturally Appropriate Housing

- Participants expressed a need for housing that respects their cultural practices, such as space for horses and community-oriented living.
- There is frustration over the lack of progress on promises for transient accommodation and culturally appropriate housing made in previous plans.
- Participants related how the criminalization of temporary encampments under trespass laws has disproportionately affected young Traveller families, leading to legal and housing challenges.

Communication and Trust Issues

- There is a breakdown of trust between the Traveller community and the authorities due to poor communication and a perception of unfulfilled promises. Some participants recall a survey conducted 10 years ago that they felt led to no tangible improvements, particularly in primary healthcare. Other participants recalled being presented with models for day units and bays that to their knowledge had not been delivered, leading to distrust.
- Specific cases were mentioned where individuals were removed from waiting lists without explanation, despite their understanding that bays were available, causing frustration and suspicion.
- Participants are often unaware of their rights and the council's obligations, exacerbating feelings of neglect and disrespect.

Summary of Positive Aspects of Current Accommodation



Satisfaction with
Housing and
Neighborhood

Many participants expressed contentment with their houses, neighbours, and the areas they live in. They appreciate the stability and the environment around them.



Close Proximity to
Family and
Community

Living close to family members, including brothers and sisters, is a significant positive aspect for many. This proximity fosters a sense of community and support.



Access to Basic
Amenities and
Facilities

Basic amenities such as toilets and essential facilities are appreciated, contributing to the overall livability of their current accommodation.



Educational and
Community
Services

Proximity to schools and other community amenities is seen as a major benefit, making daily life more convenient and accessible.



Secure Living
Conditions

While the accommodations may not be perfect, participants are glad to have a livable space with basic amenities, underscoring the importance of having a secure and stable living environment.

Exploring Accommodation Preferences and Needs

Preferred Accommodation Types

Mixed Opinions on Halting Sites and Group Housing	Transient Sites
<ul style="list-style-type: none"> • Many participants feel forced into limited and unsuitable housing options. There is a call for more diverse and appropriate choices, including standard housing, group housing, and halting sites. • Preferences are split between those who value traditional Traveller accommodations, such as halting sites and group housing, and those who prefer standard housing. The former group appreciates the sense of community and cultural connection, while the latter values stability and access to amenities. • Standard housing is particularly preferred by younger Travellers. This preference indicates a trend towards seeking integration into more conventional housing arrangements. 	<ul style="list-style-type: none"> • There is significant interest in transient sites, particularly in areas like Clondalkin. These sites are seen as important for short-term stays and accommodating nomadic lifestyles. Participants felt that this flexibility would benefit those in challenging situations, such as relationship issues. • While some see transient sites as necessary, others highlight problems such as feuds and conflict, as seen in places like Stocking Hill. Effective management and maintenance are crucial to ensure these sites do not exacerbate existing issues. • Open sites for transient accommodation are not universally preferred. Issues like lack of responsibility for maintenance and waste management were noted, highlighting the need for structured and well-managed transient facilities.

This complexity and diversity of preferences underscores the importance of individualised consultation to develop a Traveller Accommodation Programme that truly meets the varied needs of the Traveller community. Each Traveller person or family needs to be consulted on a case-by-case basis to determine their specific housing needs and preferences.

While the preferred type of accommodation varies on a case-by-case basis, the following needs and preferences came up consistently among all participants regardless of accommodation type;



Well-Structured Sites

Prefer smaller sites with more space for bays and to add bays for their family members with multiple exits and entrances to enhance safety and reduce conflicts.

Large sites should be divided into smaller, manageable sections.



Safe and Healthy Living Conditions

Emphasis on sound structural housing with disability access, damp-proofing, and proper ventilation.

Ensure compliance with fire regulations and provide facilities up to safety standards, including carbon monoxide detectors.



Space for Cultural Practices

Accommodation must include space for horses and other cultural practices such as tin smithing.

Young people might prefer standard houses but still want the option of bays or group housing



Family Proximity and Expansion

Accommodation should allow for families to stay close as children marry and start their own families.

It should ideally also make accommodations for guest visitations. This could mean larger bays or adjacent housing units.

Main Concerns and Priorities in Housing Options for Traveller Families

Feuds and Conflict Management

- Feuds can be exacerbated by poor management and lack of confidentiality. There is a need for intermediaries to manage disputes and ensure confidentiality to avoid making conflicts worse.

Housing Stability and Displacement

- Participants believe there is a significant issue with pushing Traveller families out of their areas, leading to instability and conflicts. The introduction of trespass laws has further restricted their mobility.

Historic and Ongoing Neglect

- There is a historic deficit in the provision of culturally appropriate housing. Participants feel there is a conscious bias and lack of respect towards Travellers, leading to dehumanising living conditions and poor treatment by local authorities.
- Recognition of the historical deficit in culturally appropriate housing is essential. There's a need for the government and local authorities to acknowledge and address the unique familial structures and cultural practices of the Traveller community.

Suggested Solutions and Preferences for Future Housing

1. Increase and Improve Housing Options

- Provide a range of housing options, including larger bays for extended families, group housing schemes, standard housing, and transient sites. These options should cater to the diverse needs of Traveller families.
- Ensure all housing options meet high standards of safety, health, and comfort
- Design accommodations to be disability accessible from the outset to cater to future needs.
- Design housing solutions that provide adequate space for families to avoid overcrowding. This includes larger bays and the ability for families to expand their living spaces as needed.
- Construction should avoid issues like mould and poor ventilation.

2. Enhanced Maintenance and Infrastructure

- Ensure timely and adequate maintenance of Traveller accommodations. Basic infrastructure improvements, such as footpaths, green spaces, and fire safety measures, should be prioritised.
- Regular maintenance, including fixing windows, addressing dampness, and updating safety equipment like carbon monoxide detectors.
- Grants and resources to ensure houses are damp-proof and structurally sound.

3. Community and Cultural Spaces

- Include green spaces, parks, and play areas for children.
- Provide social gathering spaces within housing plans to maintain cultural traditions and community cohesion.
- There is a need for more community-oriented spaces and greener environments. Specific sites lack play facilities and safe green spaces for children.
- Community spaces that preserve and support Traveller culture and traditions, such as tin smithing or wagon making were also suggested

4. Consultation and Customisation

- Conduct ongoing consultations with Traveller families to understand their specific needs and preferences. Housing solutions should be flexible and accommodate the cultural practices and familial structures of the Traveller community.
- Offer flexible housing solutions that can adapt to changing family sizes and needs over time.

5. Combat Discrimination & Historic Neglect

- Implement measures to combat discrimination and stigma against Travellers in housing. This includes allowing Travellers to keep caravans and horses on rented properties and ensuring fair treatment in the private rental market.
- Ensure housing arrangements allow Travellers to "stick together" without being forced to assimilate into settled communities.
- Acknowledge and address the historical neglect of Traveller housing needs. Implement ongoing assessments and evaluations to ensure culturally appropriate accommodations are provided.

6. Improved Management of Feuds

- Establish intermediaries or an RTB-type body to manage disputes and ensure confidentiality in conflict situations. This would help in preventing and resolving feuds more effectively.

7. Innovative Housing Solutions

- Consider modular homes and all-weather residential mobiles as housing options, particularly for younger Travellers. These can provide flexible and modern living spaces that meet safety and health standards.

8. Traveller Accommodation Authority

- Establish a dedicated Traveller Accommodation Authority to oversee the implementation and maintenance of housing solutions. This authority would ensure that Traveller housing needs are met and maintained to high standards.

9. Regular Reviews and Impact Assessments

- Conduct regular reviews and impact assessments of housing strategies, focusing on health, education, and overall well-being. This will help in making necessary adjustments and ensuring the effectiveness of housing policies.

By addressing these concerns and implementing the suggested solutions, participants believed that housing options for Traveller families can be significantly improved, leading to better living conditions and a higher quality of life for the Travelling community.

Information on Families and Supports

Family Composition and Projected Growth

Although the scope of this project did not include data collection on family composition and projected growth, South Dublin County Council is currently conducting a survey to gather this information. It is recommended that the data from this survey be accurately and comprehensively collected with awareness and mitigation of potential discrepancies in data. For example, our research highlighted that hidden homelessness is a concern, with some Travellers not identifying themselves due to fear of repercussions or being moved away from their community. Once accurately and comprehensively collected, this information should then be utilised to enhance the insights in this report and to develop an effective, area-specific Traveller Accommodation Programme.

Key insights on housing-specific supports

Awareness and Access to Grants and Supports

- There are supports and grants available for Traveller accommodation, but awareness and access vary.

- Grants for maintenance and structural repairs are mentioned, but they are not always easy to obtain.

Effectiveness of Grants

- Existing grants, especially for caravans, are perceived as inadequate or a "joke."
- High demand for grants leads to difficulties in access and distribution.

Maintenance Responsibility

- Maintenance responsibilities, particularly for structural, water, and electrical issues, should fall on the local councils (e.g., SDCC).

Caravan/Trailer Loans

- Caravan loans are difficult to secure and repay.
- Legislation currently blocks the ability for Travellers to rent mobile homes from the council due to their classification as "movable" dwellings. There is a need for legislative change to validate and support the cultural differences of the Traveller community
- Suggested changes include centralising the rental of mobile homes through local authorities, similar to models used in the UK.

Discrepancies between Councils and need for Communication

- There is a perception among participants that SDCC are not held accountable for their actions. Their belief is that other councils such as DLR, Finglas, and Dublin City are more responsive and effective. This perception reinforces the lack of trust and relationship between SDCC and Travellers living in this area.
- Fingal County Council was highlighted by participants as a local authority who they feel has been effective in providing accommodation and making necessary upgrades.
- There is a need for better communication and knowledge-sharing among different councils to improve the use of available funding and resources.

Mental Health and Support Services

- The connection between housing conditions and mental health was highlighted, with poor living conditions contributing to mental health issues.

- There is a need for mental health resources that are accessible and culturally appropriate for the Traveller community.
- Recognise the impact of housing on education and health services, ensuring that accommodation supports overall well-being.

By addressing these trends and issues, support systems for Traveller accommodation can be made more effective and culturally appropriate.

Summary of Thoughts on Housing Assistance Payment (HAP) and Its Applicability to Traveller Accommodation

General Awareness and Usage

There appears to be a low level of usage and direct experience with HAP among the Traveller community. Some are aware of it but have not used it personally.

There is a significant need for education regarding HAP, specifically how Travellers can benefit from it. Many people do not fully understand HAP or know if they are entitled to it.

Culturally Appropriate Systems

HAP is seen as not being culturally appropriate for Traveller lifestyles, particularly because it does not account for aspects like space for horses or other culturally significant practices.

Consultation Concerns

The current consultation processes related to HAP and housing policies do not effectively include Traveller communities or their specific needs, highlighting a gap in policy engagement and development.

Perceptions of HAP's Effectiveness

Some participants believe that HAP is too short-term in focus, suggesting a need for longer-term solutions to housing assistance that better align with the needs of Travellers.

Future Consultation Process

Preferred Consultation Methods

Face-to-Face Interaction



- The most emphasised method is face-to-face interaction, valued for its directness and effectiveness in addressing concerns immediately and personally. This method is viewed as more accountable and provides a paper trail which is necessary for transparency.

Accessibility and Local Engagement



- The complexity and inaccessibility of the current system create significant barriers for the Traveller community.
- Dyslexia and illiteracy complicate navigation of the housing system for some Travellers, even for those who can read. These challenges should be addressed in future consultations and engagements.
- Not all Travellers have easy access to digital tools, indicating a need for additional support in this area
- Participants suggested hosting local clinics or drop-in sessions in accessible community spaces like libraries, which can facilitate easier access for those who might find travelling to the city centre or larger towns challenging. This would cater to local needs and allow for regular, structured interactions.

Accountability and Transparency



- There is a strong call for increased accountability in interactions, Participants would like to see council representatives engaging more responsibly with Traveller issues. Participants suggest that face-to-face meetings should be recorded or traceable by an impartial party to ensure both sides benefit and have a reference for accountability.
- There's a clear need for transparency about financial allocations and outcomes. Participants want a breakdown of expenditures and accountability for the funds dedicated to Traveller accommodation. It was suggested by some that independent oversight or audits could help ensure that funds are used appropriately.

Consistent and comprehensive consultation



- The consultation process should start with an understanding of individual preferences and needs before suggesting accommodations. It should include a thorough discussion about available supports and the responsibilities of the council regarding maintenance and structural issues.
- Recommendations include more consistent and regular communication, such as monthly meetings to discuss ongoing issues and progress. These meetings should be well-documented and lead to tangible outcomes.

Cultural Competence and Inclusivity



- Consultations should be culturally competent, acknowledging and integrating the unique needs and lifestyles of the Traveller community, such as provisions for horses or culturally specific living arrangements.
- Services should be designed and delivered in a way that does not force assimilation but rather respects and maintains Traveller culture.

Urgent Issues with Current Consultation and Engagement

Systemic Issues and Discrimination

- There are underlying systemic issues and discrimination affecting Travellers, impacting their interaction with housing services. Examples cited by participants from their experiences include lost paperwork and the need to resort to legal threats to receive attention.

Lack of Collaboration

- In some cases, Travellers have taken matters into their own hands, fixing up sites themselves. This self-help indicates a strong community capability that should be supported and developed. More collaborative initiatives can help empower the local Traveller community and build much needed trust.

These insights suggest that while face-to-face interactions are crucial for effective consultation, there is a need for systemic changes to reduce bias and discrimination

and improve transparency, accountability, and cultural competence in the consultation processes involving the Traveller community.

Linking Workshop Feedback with Policy Frameworks

The following section draws comparisons between the wider policy context explored in Section 2 and the direct feedback received from Travellers living in South County Dublin today. These parallels between macro and micro-factors relating to Traveller Accommodation should help with the creation of a well-considered and well-evidenced Traveller Accommodation Programme for the 2025-2029 period.

Policy Context	Workshop Feedback
1. Consultation and Participation	
<ul style="list-style-type: none"> The Housing (Traveller Accommodation) Act 1998 mandates Local Authorities to prepare and adopt Traveller Accommodation Programmes (TAPs) in consultation with the Traveller community. 	<ul style="list-style-type: none"> Participants emphasised the need for genuine and ongoing consultation, highlighting past failures where Travellers were not consulted or involved meaningfully in the planning process. Effective consultation methods preferred include face-to-face interactions, local clinics, and regular meetings, which ensure that Traveller voices are heard and respected. Consideration should be made for accessibility issues facing many Travellers, including lack of access to digital tools/internet and illiteracy
2. Cultural Appropriateness and Suitability	

- The National Traveller and Roma Inclusion Strategy 2017-2021 emphasises the provision of culturally appropriate accommodation.
- Recognition of Travellers as an ethnic minority in 2017 underscores the need for culturally sensitive solutions.

- The need for accommodations that respect cultural practices, such as space for horses and family gatherings, was frequently mentioned.
- Participants called for more choice in culturally appropriate housing options, such as transient sites and modular homes with proper insulation and amenities.

3. Living Conditions and Maintenance

- Human rights groups have identified significant issues in state-owned Traveller accommodations, including overcrowding, pest infestation, and lack of basic facilities.
- The Traveller Accommodation Expert Review 2019 and other audits highlight the need for better implementation and maintenance of Traveller sites.

- Participants reported severe maintenance issues, including dampness, broken windows, and unsafe conditions, which have not been addressed despite repeated complaints.
- There were strong calls for more regular and accountable maintenance services to ensure safe and healthy living conditions.

4. Funding and Resource Allocation

- Despite allocated budgets for Traveller accommodation, there has been consistent underspend due to various factors, including local opposition and land acquisition challenges.
- The need for robust monitoring and reporting on the use of funds and implementation of plans has been emphasised across many

- Participants expressed frustration over the perceived mismanagement and lack of transparency regarding the use of funds for Traveller accommodation.
- There were demands for clearer accountability and regular audits to track the allocation and utilisation of resources, with this information being shared in an accessible manner with local Travellers.

recent reports into the issue of Traveller Accommodation.

5. Support Services and Infrastructure

- National strategies acknowledge the need for holistic approaches, including access to healthcare, education, and other support services, to improve the overall well-being of Travellers.
- The linkage between poor housing conditions and mental health issues was highlighted, with calls for integrated mental health and support services.
- Participants also stressed the importance of providing educational support and addressing systemic barriers to accessing services.

Recommendations

Based on the insights gathered from the Traveller community, the following recommendations are proposed to improve Traveller accommodation and address the concerns raised. These recommendations are categorised into quick wins/short-term solutions and longer-term strategies.

Quick Wins/Short-Term Solutions

Enhanced Communication and Accountability



- Issue a clear infographic on maintenance roles and responsibilities that clearly lists the responsibilities of the council as landlord and the tenant
- Implement regular face-to-face consultation sessions in accessible locations such as local clinics or libraries. Ensure these sessions are scheduled monthly and widely communicated.
- Establish a clear and responsive point of contact within the council for Traveller accommodation issues, ensuring timely responses to inquiries and maintenance requests.

	<ul style="list-style-type: none"> • Provide clear documentation and transparency on the allocation and use of funds dedicated to Traveller accommodation.
Improved Maintenance and Infrastructure	
	<ul style="list-style-type: none"> • Conduct an immediate review of existing Traveller accommodation to identify urgent maintenance needs, such as fixing windows, addressing dampness, and ensuring safety standards are met (e.g., carbon monoxide detectors). • Set up a dedicated maintenance team to handle Traveller-specific housing issues promptly, with clear accountability for addressing reported problems.
Education and Awareness	
	<ul style="list-style-type: none"> • Launch an educational campaign to inform the Traveller community about available supports and grants, such as the Housing Assistance Payment (HAP) and maintenance grants. • Ensure that information is accessible, possibly through face-to-face meetings, printed visual materials, audio materials and community events.
Conflict Management	
	<ul style="list-style-type: none"> • Introduce trained intermediaries to manage and mediate conflicts within Traveller sites, ensuring confidentiality and sensitivity to community dynamics. • Develop a confidential system for Travellers to report disputes and issues without fear of repercussion.

Longer-Term Recommendations

Cultural Competence and Inclusion



- Develop housing solutions that respect and incorporate Traveller cultural practices, such as space for horses and family gatherings, room for expansion with growing families
- Establish a Traveller Accommodation Authority, similar to models in Northern Ireland, to oversee the development and maintenance of Traveller-specific housing. This authority should include representation from Traveller communities.
- Introduce an intermediary body, similar to the RTB but specifically for the Traveller Community, to manage and mediate all disputes between the council and tenants, regulate and enforce compliance with rental legislation by both parties and advocate for and educate on housing rights and responsibilities.

Legislative and Policy Changes



- Advocate for legislative changes to allow for the rental of mobile homes through Local Authorities, recognizing them as valid long-term accommodation options.
- Implement policies that require ongoing consultation with Traveller communities for any new housing developments or changes to existing sites.

Improved Living Conditions



- Phase out the use of unsuitable steel units and replace them with more comfortable and appropriate housing structures, such as modular homes with proper insulation and facilities.
- Design new sites and refurbish existing ones to include essential amenities like green spaces, play areas, and proper utility connections.

Comprehensive Support Services



- Integrate mental health and support services into Traveller accommodation plans, recognizing the link between living conditions and mental health.
- Provide targeted support for literacy and navigating housing systems to ensure all Travellers can effectively engage with available resources.

Long-Term Planning and Community Involvement



- Ensure that all new Traveller accommodation projects involve community consultation from the planning stages through to implementation, allowing for input on design, location, and facilities.
- Explore opportunities for co-created and co-managed initiatives with local Traveller community to build community capacity and trust
- Monitor and evaluate the impact of housing policies on Traveller communities regularly, adjusting strategies based on feedback and evolving needs.

Conclusion

The findings and recommendations presented in this report highlight the critical need for South Dublin County Council to address the specific housing needs and challenges faced by the Traveller community. Through this consultation activity, several key issues have been identified, including inadequate living conditions, lack of culturally appropriate housing, poor maintenance, and systemic barriers to accessing support.

To conclude, a summary of the key points made is listed below:

- 1. Need for Genuine Consultation:** Effective, ongoing consultation with the Traveller community is essential to ensure that housing solutions are tailored to their needs and preferences. An increase in the amount of face-to-face interactions, local clinics, and regular meetings can significantly improve communication and trust between the council and the Traveller community.
- 2. Accountability and Transparency:** Further transparency in the allocation and use of funds, along with clear accountability for maintenance and support services, is crucial. This information should be shared in ways that are accessible to Travellers and is mindful of issues of digital access, literacy, etc. This will help address the historic neglect and build confidence within the community.
- 3. Cultural Competence:** Housing solutions must respect and incorporate Traveller cultural practices, providing appropriate space for extended families, horses, and community gatherings. Legislative changes are needed to support the rental of mobile homes and other culturally significant accommodations.
- 4. Improvement of Living Conditions:** Participants emphasised the need for immediate action to address urgent maintenance issues and phase out unsuitable housing units. Long-term investments in modern, comfortable, and well-maintained housing will improve the quality of life for Traveller families.
- 5. Comprehensive Support Services:** Integrating mental health, educational, and support services into housing plans will address the broader impacts of inadequate accommodation on the Traveller community's well-being.

By implementing the recommended actions in both the short and long term, SDCC can create a more inclusive and supportive environment for Travellers. This approach will not only meet legal obligations but also foster a community where Travellers can thrive, preserving their cultural heritage while enjoying improved living standards. Continued collaboration and genuine engagement with the Traveller community are essential to achieving these goals and ensuring the success of the Traveller Accommodation Programme 2025-2029.

We would like to take this opportunity to thank all of the participants for taking part in these sessions and being so generous with their time and insights.

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Appendices

Appendix 1 - Workshop Discussion Guide

1) Discussion on Current Accommodation

1. What is your current living situation? Are you residing in:

- A. A halting site
- B. Standard housing
- C. Other _____

2. Share your experiences living in your current accommodation type.

- A. What are some of the challenges you face in your living situation?
- B. What are the positive aspects of your current accommodation?

2) Exploring Accommodation Preferences and Needs

3. Preferred Accommodation Types (now and into the future)

- A. Do you prefer traditional Traveller accommodation or standard housing?
- B. Why do you have this preference? What factors influence your decision?

4. Aspirations for the Future

- A. What are your aspirations regarding housing for yourself and your family (your children if appropriate)?
- B. What would your ideal vision be for traveller accommodation?

5. Concerns and Priorities

- A. What are your main concerns and priorities when it comes to housing options for Traveller families?
- B. Are there any specific needs or requirements that should be addressed in Traveller accommodation?

3) Specific Information on number of families and supports

6. Growth and space

- How many people are you living with today - Is that likely to grow and will you need more space?

7. Housing specific supports

- A. What supports are out there for traveller accommodation and housing? Have you availed of anything that has been beneficial or helpful?
- B. What are your thoughts on the Housing Assistance Payment (HAP) and its applicability to Traveller accommodation?

4) Consultation Process Going Forward

8. Effective Consultation Methods

- A. How do you think the Council can best consult with the Traveller community in the future?
- B. Do you have any suggestions or ideas for improving the consultation process?

9. Ensuring Diverse Representation

- A. How can we ensure that future consultation sessions include a diverse representation of ages and genders?
- B. Are there any specific strategies or approaches that you think would be effective?



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