



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Traveller Accommodation Programme 2019 – 2024



2018

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Section 1: Overview

1.1 Introduction

Dublin City Council is required by the provisions of the Housing (Traveller Accommodation) Act, 1998 to prepare and adopt a five year Traveller Accommodation Programme to meet the existing and projected accommodation needs of the Traveller Communities in its administrative area¹.

The current Dublin City Council Traveller Accommodation Programme will expire on 30th June 2019 and the new Traveller Accommodation Programme will cover the period from 1st July 2019 to 30th June 2024.

In accordance with the Annual Traveller Count which took place on the 30th November 2018, there are currently 802 Traveller families residing within the City boundary. These families are accommodated in a range of accommodation types from Traveller Specific Group Housing Schemes and Halting Sites to Standard housing, private rented accommodation and Approved Housing Bodies. There were a further 104 families living in Emergency Accommodation on the date the count took place.

Accommodation Type	No. of Families 2017	No. of Families 2018	% Increase / Decrease
Group Housing Schemes(Including those sharing)	191	202	+5.76%
Traveller Halting Sites (including those sharing)	63	63	+/- 0.0%
Standard Housing (Including those sharing)	294	335	+ 13.95%
Private Rented (Including those sharing)	74	69	-6.76%
Voluntary Housing Associations	12	17	+41.66%
Unauthorised sites	102	116	+3.92%
Total	736	802	+8.97%
Homeless Accommodation (not part of the count)	99	104	+5.05%

This Programme sets out the actions that Dublin City Council will implement to meet the current and future accommodation needs of Traveller families within the City over the course of the period 1st July 2019 to 30th June 2024.

It is the intention of the Traveller Accommodation Unit to utilise every available option to address the current and future needs of the Traveller Community and to improve the standards of all current Traveller accommodation through a robust refurbishing scheme².

The Traveller Accommodation Unit will continue our close working relationships with all Dublin City Council Area Offices, Area Managers and Allocation Officers, the three Greater Dublin Local Authorities, the Approved Housing Bodies including fostering a good working relationship with CENA³ which seeks to provide culturally appropriate accommodation for the Traveller community and the Department of Housing, Planning and Local Government in order to maximise the potential for the provision and allocation of new and improved accommodation options to the Traveller Communities around the city.

¹ All submissions - Appendix 4 Pages 28-68

² All submissions - Appendix 4 Pages 28-68

³ CENA Submission - Appendix 4 Page 30

Section 2: Policy Statements

- Dublin City Council is committed to the provision of high quality Traveller Accommodation in accordance with the aspirations and desires of the majority of Traveller Families identified in the Assessment of Need 2018⁴.
- The Traveller Accommodation Programme 2019 – 2024 will operate within the context of relevant legislation including:
 - The Housing (Traveller Accommodation) Act, 1998.
 - The Housing (Miscellaneous Provisions) Acts, 1992, 2002, 2009 and 2014.
 - The Local Government Act 2001
 - The Local Government Reform Act 2014
- The Planning and Development Code.
- The allocation of all Traveller tenancies in this Programme will be carried out under the Scheme of Letting Priorities 2018⁵.
- All tenancies are subject to the payment of differential rent and the good estate management requirements of the various Housing Acts.
- Dublin City Council will continue to provide or have provided a comprehensive range of on-site and off-site services for Travellers. Such services to include the Social Worker Service, Estate Management, Site Maintenance, Cleansing and Caretaker Service.
- Dublin City Council will continue to engage on all Traveller issues through the Local Traveller Accommodation Consultative Committee, Inter Agency Groups, National Organisations, Traveller Representative Groups and Traveller Resident Associations⁶.
- Dublin City Council will engage with the three Greater Dublin Local Authorities to explore potential areas for collaboration in relation to Traveller issues.
- In accordance with the Housing (Traveller Accommodation) Act 1998, Local Authorities are required to consider the need for transient facilities⁷.

It is Dublin City Council's view that:

- Transient sites should only be provided following the full provision of the Traveller specific requirement of Travellers indigenous to the Dublin City Council administrative area.
 - Transient sites should be provided only if there is demand for them.
 - Notwithstanding this, meetings between the four Greater Dublin Local Authorities, which have been ongoing, will continue in order to explore the provision of transient accommodation⁸.
- It is Dublin City Council's policy to provide Traveller specific accommodation for the City Council's indigenous Travelling Community⁹. For this purpose, the City Council will regard a Traveller household as indigenous where:
 - The householder has been resident within the City Council's administrative area for any continuous five-year period that an accommodation applicant was previously a tenant of, or resident, in the City Council's administrative area

⁴ All submissions - Appendix 4 Pages 28-68

⁵ Pavee Point Submission - Appendix 4 Page 51, BTAP Submission Page 66

⁶ All submissions - Appendix 4 Pages 28-68

⁷ BTAP Submission - Appendix 4 Page 68

⁸ BTAP Submission - Appendix 4 Page 66

⁹ All submissions - Appendix 4 Pages 28-68

OR

- The householder has been resident within the City Council’s administrative area for at least three years prior to the adoption of the City Council’s Traveller Accommodation Programme 2019-2024, i.e. since 2016.

The latter provision allows for the inclusion of Travellers who have not had five years residency in the administrative area. The two provisions, either of which come within this definition of indigenous, allow the City Council to plan in some meaningful way to address the housing needs of the families most closely associated with the area.

However, this does not preclude members of the Travelling Community not assessed for the current Programme from applying for Traveller specific accommodation and being considered in exceptional circumstances.

- It is Dublin City Council’s policy to provide choice in both housing tenure and location insofar as is possible. It is also Dublin City Councils intention to ensure choice is available to Travellers through greater geographic diversity within the wider City Council area. This would then reduce the reliance on clustering in specific areas through the consideration of alternative locations to accommodate Traveller applicants on the current waiting list¹⁰.
- Dublin City Council will continue to investigate new and existing sites with a view to obtaining qualifying sites to develop new Traveller specific accommodation¹¹.

However, it must be noted that the current footprint allocation of land for Traveller Specific Accommodation cannot be sustained in Dublin City’s heavily urbanised area.

The Traveller Accommodation Unit will work with Travellers and Traveller Representative Groups to identify the needs of specific families/family groups in order that the lands allocated for housing/halting sites is maximised and used to their full potential¹².

- Dublin City Council has noted the increased interest of the Traveller Community in accessing standard housing¹³. The Traveller Accommodation Unit shall endeavour to increase the number of standard housing allocations to Travellers in cooperation with Local Area Offices.



Avila Group Housing Scheme, Finglas, Dublin 11

¹⁰ All submissions - Appendix 4 Pages 28-68

¹¹ BTAP Submission - Appendix 4 Page 67

¹² All submissions - Appendix 4 Pages 28-68

¹³ BTAP Submission - Appendix 4 Pages 65 and 66

Section 3: Statement of Strategy

- Dublin City Council, under the legislative provision, is the implementing authority for the new Traveller Accommodation Programme 2019 - 2024. Dublin Council commits to work collaboratively with all stakeholders in order to secure success. Aside from individual Travellers, Traveller Families and Traveller Development Groups, such stakeholders will include the Health Service Executive, Department of Housing, Planning & Local Government, Department of Education & Skills, Department of Health, Department of Employment Affairs & Social Protection and Approved Housing Bodies¹⁴. The Traveller Accommodation Unit will endeavour to establish links to the Local Community Development Committee and the Local Economic Development Committee in order that Traveller issues are tabled on a citywide basis.
- The Traveller Accommodation Programme 2019 – 2024 is based on the premise that there will be adequate funding available with which to bring forward and complete this ambitious programme. Dublin City Council will work with the Department of Housing, Planning and Local Government to ensure that potential sources of funding can be identified and sought in a timely manner¹⁵.
- Annual targets will be reviewed on an ongoing basis to ensure that progress is being maintained. Regular reporting will be provided to Dublin City Council’s Senior Housing Team, the Housing Strategic Policy Committee and to the Department of Housing, Planning and Local Government. A report on all activities under this programme will also be furnished at each LTACC meeting¹⁶.
- Land acquisition in the highly urbanised area of Dublin presents particular problems in relation to the footprint that has heretofore been the norm for Traveller Specific Accommodation. This Programme will focus on maximising the potential for each available site whilst ensuring that culturally appropriate Traveller accommodation needs are met. This means that best practices will be investigated and implemented in consultation the LTACC and Travellers locally¹⁷.
- Dublin City Council will work with our neighbours in Dun Laoghaire/Rathdown, Fingal and South County Dublin to identify areas of common interest and will look for opportunities to cooperate on Traveller Accommodation projects thereby maximising resources.



St Oliver's Park, Traveller Halting Site, Cloverhill Road, Dublin 10.

¹⁴ BTAP Submission - Appendix 4 Page 65

¹⁵ All submissions - Appendix 4 Pages 28-68

¹⁶ Pavee Point Submission - Appendix 4 Page50, HSE Submission Page 59

¹⁷ All submissions - Appendix 4 Pages 28-68

Section 4: The Operation of the Local Traveller Accommodation Consultative Committee

The Local Traveller Accommodation Consultative Committee (LTACC) advises the City Council in relation to the provision of accommodation for Travellers, the preparation and implementation of any accommodation programme for our functional area and the management of accommodation for Travellers.

Dublin City Council's LTACC has been an excellent forum where City Council officials, Councillors, Traveller representative groups and members of the Travelling Community can discuss Traveller accommodation issues. Following a recommendation by the LTACC, it was agreed by the City Council that at least one Councillor on the LTACC should also be a member of the Housing Strategic Policy Committee.

The LTACC will meet bi-monthly from 2019 onwards¹⁸ and special meetings along with sub-group meetings (where necessary) are also convened, as required. This will continue to be the case. Where appropriate, sub-groups within the LTACC will be established to discuss specific issues as they arise. An Annual Report is published which details the various activities of the LTACC. Annual targets will be reviewed on an ongoing basis and updates will be provided at meetings of the LTACC¹⁹.

A review workshop of the City Council's LTACC's Terms of Reference was facilitated by the Irish Traveller Movement in 2019. This is the third such review of the workings of the LTACC following on from two previous reviews. The purpose of these reviews was to consider how the LTACC could work better and all members were able to commit to an improved and agreed set of principles in order to ensure the Committee can work more effectively. The Draft Terms of Reference agreed at the most recent workshop are detailed in Appendix 1.



Cara Group Housing Scheme, Belcamp Lane, Coolock, Dublin 17

¹⁸ BTAP Submission - Appendix 4 Page 67

¹⁹ All submissions - Appendix 4 Pages 28-68

Section 5: Evaluation of the 2014-2018 Traveller Accommodation Programme

A new-build target of 41 houses/units along with 89 day house refurbishments and various electrical and accommodation upgrades was proposed in Dublin City Council's Traveller Accommodation Programme 2014-2018. The review was carried out by the LTACC and facilitated by the Irish Traveller Movement in March 2019.

The figures below show what has been achieved under this programme.

5.1 Schemes Delivered

Citywide Schemes Delivered in the last Programme:

- Three Kylemore Grove house rebuilds completed.
- Two house rebuilds were completed in Bridgeview and Avila Park.
- Seven houses affected with pyrite were remediated in Avila Group Housing Scheme.
- Electrical Upgrades to 30 Bays in St Margaret's Park was completed.
- A total of twenty nine (29) sanitation units were purchased and refurbished during the lifetime of the programme.
- Five day-houses were refurbished in St. Joseph's Park.
- Two houses were refurbished in St. Mary's Park.
- Eight overcrowding and special needs extensions were completed in the various schemes.
- Two house purchases were completed.
- Three Temporary bays were completed.
- Twenty one (21) bathroom upgrades were completed to accommodate specific needs of residents.
- Twenty Four (24) back yards were replaced or refurbished as part of the Programme
- A new Term Maintenance Framework has been completed.
- A new Sanitation Unit Framework has been completed in conjunction with the other local Authorities in the Greater Dublin Area.
- A new Capital Works Management Framework to deal specifically with Traveller builds is being developed in conjunction with the other local Authorities in the Greater Dublin Area which will work in conjunction with this new programme.

5.2 Housing Allocations to Traveller applicants

In addition to the proposed new-build programme, it was estimated that 10-15 Traveller Specific units would be provided per year through casual vacancies, while an additional 10-15 units would be provided through Standard Housing allocations.

A total of 93 standard units of accommodation have been provided through Standard Housing allocations between 2014 and 2018, which is almost 93% of our stated target. There were 22 Group Housing refurbishments (+214%) and 67 Bay/Unit refurbishments (-24.7%) during the lifetime of the programme. There were no additional housing units built during the Programme

5.3 Outstanding Projects from 2014-2018 Programme

A number of projects from the previous TAP have not been completed for various reasons. Pidgeon House Road and Grand Canal Harbour Projects were not completed due to a lack of interest in the accommodation to be provided and the area selected.

On the ground consultation with the Travellers in the various schemes has changed the priorities and the nature of the projects and these are reflected in the new Traveller Accommodation Programme.

Section 6: The Assessment of Needs

6.1 The Assessment of Needs Process²⁰

The procedure used to carry out the Housing Needs Assessment was both detailed and collaborative and commenced in November 2018. The process included the sending of letters to all Traveller Specific Applicants to ensure every effort was made to contact all such applicants. In addition to this, as many applicants and potential applicants as possible were contacted directly by Dublin City Council Traveller Accommodation Unit staff, Traveller Social Workers, DRHE staff, Representative Groups and LTACC members to encourage them to contact the Traveller Accommodation Unit to ensure they remained on the list or submitted an application. 73 Traveller Specific housing applications were identified through this process and the breakdown is given in Table 6.1.1 below²¹.

Table 6.1.1

Area	Area Preference	No Preference	Other Area Preferences	Other LA Preferences	No. of Beds required
North West	11	0	0	0	Size 1 - 28
South Central	26	0	0	2	Size 2 - 21
Central	0	0	0	0	Size 3 - 16
North Central	27	0	5	0	Size 4 - 6
South East	0	0	1	0	Size 5 - 2
Total	64	4	6	2	73

Further surveys were then carried out under the Scheme of Lettings 2018 by Dublin City Council staff in each area. There are 139 current applications for Standard housing. An area breakdown of the application preferences can be found in Table 6.1.2 below.

Table 6.1.2

Area	Current need	No. of Beds required
North West	37	Size 1 - 41
South Central	41	Size 2 - 45
Central	2	Size 3 - 40
North Central	59	Size 4 - 9
South East	0	Size 5 - 4
Total	139	139

As Dublin City Council is one of the few Local Authorities that permit Traveller applicants to remain on both lists, a total of 42 applications are for both Traveller Specific and Standard housing²².

Table 6.1.3

Summary of Preferences	Number of Families
Traveller Specific Housing	73
Standard Housing with AK Traveller Priority	139
*Families without current applications	81
Total	293
Families with applications for Traveller Specific and Standard Housing	42

The assessment carried out was both extensive and collaborative and serves as a very good basis for planning the accommodation needs of the Traveller community going forward. Families identified through this process that do not have current applications will be encouraged to complete the application process. It is further proposed that City Council Social Workers will meet with the

²⁰ ITM Submission - Appendix 4 Page 35, Pavee Point Submission Page 51, BTAP Submission Pages 65 and 66

²¹ HSE Submission - Appendix 4 Page 61

²² BTAP Submission - Appendix 4 Page 66

representative groups to ensure that Traveller applicants in private rented accommodation are identified and supported with their accommodation needs.

* In order to adequately address the needs of these families, housing applications will need to be completed for those who have not yet done so.

6.2 Current and Projected Demand for Accommodation Types 2014-2018

The following illustrates current and projected housing demand over the lifetime of this Programme²³.

As of the 30th November 2018 there are 293 families in the Dublin City Council area in need of accommodation. The following is the breakdown of current needs.

- 58 families sharing in Group Housing Schemes
- 11 families sharing in Standard Accommodation or Private Rented Accommodation
- 12 families sharing Services Halting Sites
- 108 families on unauthorised or decommissioned sites
- 104 families in Emergency Homeless Accommodation

Note: The 104 Traveller families represent approximately 9% of the total in Emergency Accommodation while the number of Traveller children in Emergency Accommodation represents approximately 11% of the total. This shows a distinct disproportionality given that Travellers make up approximately 1% of the population nationally.

6.3 Family Formation

The Assessment also identified that there are currently 106 children who will turn 18 during the lifetime of this Programme. However, Dublin City Councils priority must remain focussed on the provision of homes for the 293 identified families that immediate need or are in emergency or unauthorised accommodation.

6.4 Proposals to Meet Housing Need

It is intended to meet the housing need through the following methods²⁴:

- Proposed New house builds (47)
- Proposed New Halting Bay builds (7)
- The refurbishment of vacant houses (6)
- De-tenanting priorities (12) (Once priority is completed, houses in the Ballymun area are to be allocated to relieve any remaining overcrowding in that local area)
- The allocation of vacant/illegally occupied bays and houses (7)
- Temporary bays to facilitate upgrades (16)
- The refurbishment of bays (50)
- Standard Housing allocations (56).
- Traveller Standard Void allocations (25)
- Private Rented Accommodation (See Section 8.5)



Typical House, Cara Close, Belcamp Lane, Coolock, Dublin 17

²³ HSE Submission - Appendix 4 Page 61, 62 and 63, BTAP Submission Page 65

²⁴ All submissions - Appendix 4 Pages 28-68

Section 7: Programme Details

This section details the proposals to be brought forward under this plan. A table summarising the anticipated programme for delivery and the funding requirements is included in Appendix 2.

7.1 South Central Area:

Labre Park/Kylemore Grove

Labre Park, located on the Kylemore Road in Ballyfermot, Dublin 10 is the City Council's oldest Traveller development dating back to 1967. Kylemore Grove lies adjacent to Labre Park and consists of 8 houses which were built in 1995.

Current Position

Labre Park/Kylemore Grove currently comprises 48 families accommodated in 22 houses and mobile homes on the estate. 19 families have temporary emergency facilities. Overall, there are 28 families in need of accommodation on the estate.

Proposals under Traveller Accommodation Programme 2019-2024

Discussions have taken place between DCC, Clúid, BTAP and residents of Labre Park/Kylemore Grove, on the delivery of accommodation for Travellers in Labre Park and it was agreed that a proposal for the redevelopment of Labre Park, developed by Clúid in collaboration with BTAP and Dublin City Council, be submitted to the Department of Housing, Planning and Local Government. This proposal was fully endorsed by the City Council and submitted to the Department of Housing, Planning and Local Government. It now forms part of this Traveller Accommodation Plan. Phase one of the proposal i.e. to reconstruct three houses in Kylemore Grove has been completed as part of the current TAP.

It is therefore proposed to implement the second phase the redevelopment of Labre Park as follows:

- Phase 2: The redevelopment of Labre Park in accordance with the plans that have been agreed through the Clúid/DCC/BTAP/resident's collaboration and endorsed by the South Central Area Committee in October 2018²⁵.
- A de-tenanting priority has been requested to accommodate 6 families off site during the Phased redevelopment²⁶.

Bridgeview

Bridgeview contains eleven Traveller Specific properties and is located on the Cloverhill Road, Clondalkin, Dublin 22. It was built in 1994.

Current Position

There is currently one vacant property in need of complete refurbishment and a vacant site which was formerly a house. There is also a Community Centre located in the estate which is used by City Council staff and Traveller Support groups in the area.

Proposals under Traveller Accommodation Programme 2019-2024

It is proposed to renovate the vacant property and rebuild one house in Bridgeview.

It is also proposed to update the boilers in all houses to reflect best practices.

St. Oliver's Park

St. Oliver's is a fourteen bay halting site with one Traveller specific house located on Cloverhill Road, Clondalkin, Dublin 22. It was built in 1995.

Current Position

²⁵ BTAP Submission - Appendix 4 Page 67

²⁶ BTAP Submission - Appendix 4 Page 67

Improvements are required to both the day houses and the electricity supply.

Proposals under Traveller Accommodation Programme 2019-2024

It is proposed to upgrade the day-houses and improve the electrical infrastructure in St. Oliver's Park according to the specific needs of the Travellers on site. It is proposed that both these projects be combined in order to reduce the effect of such a build on the Traveller residents and to achieve value for money.

An alternative proposal for this site has come about after some members of the community requested looking at the possibility of converting some or all of the bays into houses. This proposal will be looked at in the context of full consultation with all residents, the need for accommodation within the areas into the future and will be subject to funding availability.

7.2 North West Area:

St. Margaret's Park

St. Margaret's Park was built in 1997 and is a thirty bay halting site with day-house facilities located on St. Margaret's Road, Ballymun, Dublin 11.

Current Position

There are 37 families living in 30 halting bays in St. Margaret's Park. Therefore, there is a current need for 7 units of accommodation for these families²⁷.

Proposals under Traveller Accommodation Programme 2019-2024

Discussions have taken place between Dublin City Council, St Margaret's Travellers Community Association Ltd and the residents of St Margaret's on the delivery of accommodation plan for Travellers in St Margaret's Park. It was agreed that a proposal for the redevelopment of St Margaret's Park, developed by Dublin City Council, be submitted to the Department of Housing, Planning and Local Government. This pre Part VIII proposal was fully endorsed by the City Council and submitted to the Department of Housing, Planning and Local Government. It now forms part of this Traveller Accommodation Plan.

As part of this proposal, it has been agreed that four temporary bays will be built at the entrance of St Margaret's Park to assist in a phased de-tenanting of St Margaret's during the build process and said bays to be removed once the redevelopment is completed. It is also agreed that six houses would be provided by Dublin City Council locally to assist in the de-tenanting process and once completed, these six houses would be used to address any remaining overcrowding issues on site.

Avila Estate

The Avila Estate is located on Cappagh Road, Finglas, Dublin 11 and comprises three sections totalling forty-nine houses. The sections are: Avila Park (1995), Avila Gardens (2000) and Avila Close (2004).

Current Position

All forty-nine houses are currently occupied in the Avila estate. An additional twenty two families living on the estate are in need of accommodation²⁸.

Proposals under Traveller Accommodation Programme 2019-2024

It is proposed to build two houses on the site of the community centre to assist in dealing with overcrowding issues in Avila. The proposal consists of a four bedroomed house and a one bedroomed house which, it is hoped, will free up two three bedroomed houses on site.

It is also proposed to build one house in Avila Close to accommodate an unauthorised occupancy on site in agreement with the local representatives.

²⁷ St Margaret's Traveller Community Association Submission - Appendix 4 Pages 39 and 40

²⁸ Finglas Traveller Development Group Submission - Appendix 4 Pages 42 and 43

It is proposed that this programme will seek every opportunity to positively influence all local developments including the proposed development on the Kildonan Lands with a view to an allocation of properties to alleviate the overcrowding issues in the Avila Estate.

It is also proposed to update the boilers in all houses to reflect best practices.

St. Mary's Park

St. Mary's Park is located on Dunsink Lane, Finglas, Dublin 11 and is a ten house Group Housing Scheme built in 1987²⁹.

Current Position

Funding was secured to build an overcrowding extension to one house and 3 back yards. It is expected that the back yards will be completed by the end of Q1 2019 and the overcrowding extension by Q4 2019.

Proposals under Traveller Accommodation Programme 2019-2024

A vacant site at the corner of No. 1 St Mary's Park has been identified as suitable to develop. A single 3 bedroomed house is deemed appropriate and will facilitate local overcrowding issues.

The Traveller Accommodation Unit will develop close links with Fingal County Council to secure extra lands to build for the future of St Mary's occupants and to prevent overcrowding.

It is also proposed to update the boilers in all houses to reflect best practices.

St. Joseph's Park

St. Joseph's Park on Dunsink Lane, Finglas, Dublin 11, was previously a twenty-eight bay halting site built in 1996.

Current Position

Due to a significant part of the site becoming vacant, a decision was made to divide it in two and reduce the numbers of bays to fourteen. During the 2014-2018 TAP, 5 bays were refurbished. There is a Community Centre on site which is in a state of disrepair³⁰.

Proposals under Traveller Accommodation Programme 2019-2024

Dublin City Council intends to demolish the Community Centre in agreement with the residents. The current meter room will be retained and reinforced to supply the site. Upgrades to the sewage system, surface water system and water supply are proposed in order to better supply the needs of the site.

The Traveller Accommodation Unit will develop close links with Fingal County Council to secure extra lands to build for the future of St Joseph's occupants and to prevent overcrowding.

Under the new TAP, it is proposed to upgrade the day-houses and the electrical infrastructure in St. Joseph's Park.

An alternative proposal is currently being investigated whereby a new housing scheme is proposed. It is expected to be located closer to the entrance to Dunsink Lane from the Ratoath Road, would cater for the families currently occupying St Joseph's Park and would result in the decommissioning of St Joseph's Park. This project has agreement in principle from the local Travellers and the Finglas Travellers Development Group. Agreement will need to be reached with Fingal County Council and will require a redesign of the area and the resources to bring this ambitious proposal to fruition.

A full investigation on the benefits and value of each proposal will be completed and agreement reached with the relevant stakeholders prior to any decision being reached. In the interim, some

²⁹Finglas Traveller Development Group Submission - Appendix 4 Page 45

³⁰Finglas Traveller Development Group Submission - Appendix 4 Pages 43 and 44

remedial works will need to be completed on the current site for the safety and comfort of the residents of St Joseph's Park.

7.3 North Central Area:

The North Central area has been particularly problematic in relation to Traveller Specific Accommodation due to the number of sites close together in a small area³¹. A small local area development plan is currently being developed as detailed below which sets out Dublin City Councils commitments over the course of this Programme. Dublin City Council recognises the difficulty in delivering such an ambitious plan, yet is confident that its delivery will improve significantly the standard of living of all Travellers accommodated in its estates and will also improve the environmental landscape around the North Coolock area. It is proposed that CENA³² play a pivotal role in the consultation and implementation of the planned redevelopment of this area.

Northern Close

Northern Close is a twelve house Group Housing Scheme located on Belcamp Lane, Coolock, Dublin 17. It was built in 2001.

Current Position

There are currently eleven houses in the estate.

Proposals under Traveller Accommodation Programme 2019-2024

As part of a small local area development plan it is proposed to rebuild a house on a vacant site in the estate. It is also proposed to refurbish the current houses on site and to regularise the tenancies of all residents in the state³³.

It is also proposed to update the boilers in all houses to reflect best practices.

Tara Lawns

Tara Lawns is 10 bay halting site located on Belcamp Lane, Coolock, Dublin 17. It was built in 2000.

Current Position

Tara Lawns is currently decommissioned³⁴.

Proposals under Traveller Accommodation Programme 2019-2024

It is proposed to recommission Tara Lawns as a Halting Site under the remit of Dublin City Council. To that end, it is proposed to provide the current families resident on site with services through the provision of Sanitation Units prior to a redevelopment of the site (see below) subject to service provider's permission and cooperation.

It is proposed to redevelop Tara Lawns as part of a small local area development plan with a view to returning the site to full use. There are currently ten families on site and it is Dublin City Council's intention to regularise their occupancy.

It is also proposed to develop a temporary 10 bay site adjacent to Tara Lawns which will be used to accommodate the families currently occupying Tara Lawns during the redevelopment of the site. Upon conclusion of this redevelopment, it is proposed to continue to use part of this temporary site to facilitate the redevelopment of St Dominic's Park and to deal with further accommodation issues in the future.

St. Dominic's Park

³¹ TravAct Submission - Appendix 4 Page 41

³² CENA Submission - Appendix 4 Page30

³³ ITM Submission - Appendix 4 Page37, TravAct Submission Page 41, Exchange House Submission Page 56

³⁴ ITM Submission - Appendix 4 Page37, TravAct Submission Page 41, Exchange House Submission Page 56

St. Dominic's is a twenty-three bay halting site on Belcamp Lane, Coolock, Dublin 17 and was built in 1996.

Current Position

St Dominic's Park is currently decommissioned³⁵.

Proposals under Traveller Accommodation Programme 2019-2024

Dublin City Council has been working with the twenty three unauthorised families who currently occupy St Dominic's Park in an effort to address their housing need. In this context the City Council is developing a proposal to refurbish the entire estate as part of a small local area development plan.

It is proposed to recommission St Dominic's Park as a Halting Site under the remit of Dublin City Council. To that end, it is proposed to provide the current families resident on site with services through the provision of Sanitation Units prior to a redevelopment of the site (see below) subject to service provider's permission and cooperation.

It is proposed to redevelop St Dominic's Park as part of a small local area development plan with a view to returning the site to full use. There are currently twenty three families on site and it is Dublin City Council's intention to regularise their occupancy.

It is also proposed to develop a temporary 10 bay site between St Dominic's and Tara Lawns Halting Sites which will be used to accommodate the families currently occupying St Dominic's during the phased redevelopment of the site. Upon conclusion of this redevelopment, it is proposed to continue to use part of this temporary site to deal with further accommodation issues in the future.

Grove Lane

Grove Lane is located on the Malahide Road, Coolock, Dublin 17. Six group-houses were built in 1989.

Current Position

Five houses are in a state of disrepair and the remaining house is under repair. Negotiations are ongoing with the current residents of Grove Lane with a view to maximising the building potential of the available land³⁶.

Proposals under Traveller Accommodation Programme 2019-2024

It is proposed to redevelop this estate. The Traveller Accommodation Unit propose to build four houses to address the current resident family's needs.

It is further proposed that the remaining land be developed as a separate Traveller Specific Accommodation site i.e. five bays and one single bedroomed bungalow to accommodate other long term unauthorised families in the Coolock area.

However, this proposal has met with some difficulties and will need careful negotiation, possible revision and consideration in order for the project to be realised.

Cara Estate

Cara Estate is made up of Cara Park (1986) and Cara Close (2001), comprises forty-one group houses and is located on Belcamp Lane, Coolock, Dublin 17.

Current Position

All forty-one houses are currently occupied. There are thirty-three mobile homes with families on site, nine on the grounds of the old community centre and the remaining twenty-four at the rear of houses or on empty lands. This gives a total of seventy-four families living in the Cara Estate.

Proposals under Traveller Accommodation Programme 2019-2024

³⁵ ITM Submission - Appendix 4 Page 37, TravAct Submission Page 41, Exchange House Submission Page 56

³⁶ ITM Submission - Appendix 4 Page 37, TravAct Submission Page 41, Exchange House Submission Page 56

It is proposed to demolish the community centre and build six houses to address some of the current overcrowding needs. It is also proposed to demolish the Fás Centre and use the site to deliver quality Senior Citizen Housing i.e. single bedroomed accommodation. It is hoped that this initiative will release other houses in the estate more suited to larger family needs. Other lands surrounding the estate and on site will be investigated with a view to accommodating those in overcrowded conditions in the Cara Estate³⁷.

It is also proposed to update the boilers in all houses to reflect best practices.

Belcamp Lane/Newtown Court

It is proposed that the development of the lands at Belcamp Lane include Traveller Specific Accommodation and standard housing to accommodate the Traveller Community on a number of sites in this area. These plans are tentative at the moment and will require a considerable amount of negotiation and resources. A new Traveller Specific local area plan is being developed in order to address the multiplicity of problems and varying needs that face Travellers in the Coolock area³⁸.

7.4 Annual Targets³⁹

Accommodation Type	2019	2020	2021	2022	2023	2024	Total
Standard Housing Allocations	6	10	10	10	10	10	56
Traveller Specific Allocations (Houses & Bays)	5	5	5	5	5	5	30
Group Housing Refurbishments	1	1	1	1	1	1	6
Traveller Halting Bay Refurbishments	0	10	10	10	10	10	50
Temporary Bays/Services to facilitate upgrades	6	10	0	0	0	0	16
TAU Standard VOIDS	4	4	4	4	4	5	25
New Builds (Houses)	5	8	10	8	6	10	47
New Builds (Bays)	0	0	2	0	5	0	7
De-tenanting Priorities	6	6	0	0	0	0	12

All projects are subject to agreement with the LTACC, Traveller Representative Groups and most importantly the members of the Traveller Community within the Local Authority Area⁴⁰.



St Mary’s Park Group Housing Scheme, Dunsink Lane, Dublin 10

³⁷ TravAct Submission - Appendix 4 Page 41
³⁸ ITM Submission - Appendix 4 Page 37
³⁹ All Submissions - Appendix 4 Pages 28-68
⁴⁰ All Submissions - Appendix 4 Pages 28-68

Section 8: Additional Measures

8.1 Senior Citizen Accommodation

It is proposed to consider the provision of housing specifically for Senior Citizens within the lifetime of this programme⁴¹. Although life expectancy generally is lower among members of the Traveller Community, age profiles among our tenants is increasing. In some cases, elderly Traveller tenants are living alone in accommodation not suited to their needs. Dublin City Council proposes looking at the potential for developing Senior Citizen accommodation units in some of its estates where there is available land and a demand for same. This would enable the City Council to provide appropriate dwellings to meet the demands of its increasing number of elderly tenants. At the same time, it would free up dwellings that could then be allocated to applicants from our Traveller Specific Housing list or those overcrowded on site subject to the Scheme of Letting Priorities 2018. Such proposals will only be followed up if there is demand and a willingness from elderly tenants to move into Traveller Specific Senior Citizen Accommodation.

As part of this Programme it is proposed to trial Senior Citizen Accommodation in the Cara and Avila Group housing schemes.

8.2 Community & Play Facilities

A number of our sites and estates have playground facilities which provide a much needed amenity to our Traveller specific tenants and their children. The Traveller Accommodation Unit will continue to engage with the City Council's Play facilities staff with a view to enhancing current play facilities and explore the possibility of extending them to other sites and estates. With regard to Community facilities, these will be considered in the context of developments to sites and estates and existing facilities in the area⁴².

8.3 Roads and Footpaths

The City Council proposes applying for funding across all of its estates and sites for road and footpath improvement works.

8.4 Homelessness

Some of the submissions received by Dublin City Council made reference to the issue of homelessness among Travellers and contended that certain aspects of the Housing (Miscellaneous Provisions) Act, 2009 were preventing Travellers from being able to access homeless services. We consulted the Dublin Region Homeless Executive (DRHE) and having reviewed the matter, they cannot find any basis for the claim that provisions of Housing (Miscellaneous Provisions) Act, 2009 precludes access to homeless services for Travellers and any person identifying themselves as a member of the Travelling community. All decisions relating to access to homeless services in the Dublin region are determined by an assessment of the person's need and not their status, and all persons in need of emergency accommodation and who otherwise are at risk of having to sleep rough will be offered accommodation.

There are currently 104 homeless Traveller families in the Dublin City Council area. It is proposed that a member of the Traveller Social Work Team be assigned on a part time basis to work with Traveller families in crisis that are experiencing homelessness. This will ensure that Traveller families in homeless accommodation are identified and that their needs are met⁴³.

8.5 Private Rented Accommodation

As per the Memorandum issued by the Department of the Housing, Planning and Local Government with regard to the preparation, adoption and implementation of Traveller Accommodation Programmes for the period 2019-2024, alternative housing options including the Rental

⁴¹ HSE Submission - Appendix 4 Page 61, BTAP Submission - Page 65

⁴² Pavee Point Submission - Appendix 4 Page 51, HSE Submission Page 63, BTAP Submission - Page 66

⁴³ ITM Submission - Appendix 4 Pages 35 and 37, Pavee Point Submission Page 51, Exchange House Submission Page 56

Accommodation Scheme (RAS), the Housing Assistance Payment (HAP) scheme and private rented accommodation should be availed of. Some references have been made relating to the difficulties that Traveller applicants have encountered while attempting to avail of private rented accommodation or the Homeless HAP. The recent RTE Primetime report titled “The Crisis in Traveller Accommodation” 19th December 2018, showed the seeming difficulty in gaining assistance under this Scheme and an apparent bias against members of the Traveller Community by renters.

It is proposed to establish an LTACC sub-group to examine how those Travellers that may wish to source private rented accommodation can be helped and also to examine how Traveller families in standard social housing and private rented accommodation can be included more in Traveller service provision.

The sub group could also be tasked with developing an appropriate draft policy document that may inform and influence the Dublin Regional Homeless Executive Homeless HAP policy in relation to difficulties experienced by members of the Traveller Community.

The City Council acknowledges that no Traveller family identified an interest in or preference for private rented accommodation to the representative groups through the Assessment of Needs, an assessment carried out jointly between representative groups and City Council staff for this Traveller Accommodation Programme. However, whilst mindful of these findings, it is included as an interim measure and will be reviewed on an ongoing basis throughout the lifetime of the Programme. In addition, Dublin City Council will actively explore our existing landholding across the City and continue to work with Approved Housing Bodies to make every effort to limit the reliance on private rented accommodation. We will also investigate whether the option of one off house purchases and leasing can further reduce this reliance.

8.6 Anti-Social Behaviour

On 1st November 2010, Dublin City Council formally adopted its Anti-Social Behaviour Strategy in accordance with Section.35 of the Housing (Miscellaneous Provisions), Act 2009. The Strategy sets out the Council’s overall plan in dealing with issues of Anti-Social Behaviour and includes objectives, policies, procedures, customer care, Health & Safety and Legislation. Where instances of anti-social behaviour occur, appropriate action will be taken to deal with the tenant or person involved in such behaviour. Sanctions are outlined in the City Council’s Anti-Social Behaviour Strategy and can include the ultimate sanction of eviction. The Traveller Accommodation Unit has a dedicated Project Estate Officer to deal with these issues.

With regard to offences relating to entering and occupying land without consent, the City Council agrees with the ITM submission that the use of Section 24 of the Housing (Miscellaneous Provisions) Act, 2002 should only be used in exceptional circumstances and that families moved on remain on the waiting list unless accommodated by another housing authority/provider.

8.7 Site Management and Operation

8.7 A. Staffing

The Traveller Accommodation Unit is responsible for the provision of Traveller specific services to members of the Travelling Community in the Dublin City Council administrative area. The Unit is responsible for providing a housing advisory service, processing applications for Traveller specific accommodation, processing maintenance requests, managing Traveller specific rent accounts as well as assisting Travellers who wish to apply for standard housing. Personnel from the Traveller Accommodation Unit regularly calls to each our halting sites and group housing schemes and provide assistance should any tenants or applicants contact the office.

Social Workers aligned to the Traveller Accommodation Unit host weekly local based clinics, keep in regular contact with tenants and applicants and assist Travellers in relation to housing applications as well as the provision of advice, counselling and support services.

The Inspector and Supervisors are based primarily on estates and sites and liaise with Travellers, City Council staff from other Departments, as well as maintenance contractors. In addition, they

investigate unofficial encampments and supervise the caretaker service throughout our estates and sites. Caretakers are responsible for general cleaning duties, maintaining communal areas and grass cutting on each of our estates and sites.

Other assets assigned to the Traveller Accommodation Unit include Architect, Engineering, Clerk of Works and Quantity Surveying services.

8.7 B. Payment of Rent

All Traveller specific tenants are liable to pay a Differential Rental charge on their houses and bays. Dublin City Council is aware that sometimes unforeseen circumstance can prevent tenants from keeping their rent payments up to date. Tenants should be aware that the City Council's Traveller Accommodation Unit is there to help tenants when such situations arise. Arrears agreements can be set up by tenants to clear any arrears owed. These agreements can include signing up to the Household Budget system (where rent is deducted from Social Welfare payments) or paying additional amounts with a rent card. Once an arrears agreement is kept to, the TAU will be satisfied that the arrears are being reduced, even if it takes a while to clear them completely. Regular rent reviews will be carried out and will assist in recording changes to family needs and circumstances.

8.7 C. Maintenance & Repair Service

Dublin City 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 City Council will ensure that this is completed in a reasonable timeframe as set out in the Tenant Handbook. Tenants should also be aware of their responsibilities regarding the upkeep of the property as set out in the aforementioned Tenant Handbook. All tenants will receive a copy of the Tenants Handbook in 2019. An out-of-hours emergency maintenance service is provided on weekday evenings, weekends as well as bank and public holidays⁴⁴.

8.8 New Developments

The City Council will examine its landholding with a view to identifying future sites for development. Where land becomes available, the Traveller Accommodation Unit will bring forward all proposals to the LTACC for discussion. However, it must be noted that the current allocation of land for Traveller Specific Accommodation cannot be sustained in Dublin City's heavily urbanised area.

The Traveller Accommodation Unit will work with Travellers and Traveller Groups to identify the needs of specific families/family groups in order that the lands allocated for housing/halting sites is maximised and used to their full potential⁴⁵.

8.9 Tenant Participation and Estate Management

The Traveller Accommodation Unit welcomes and encourages tenant participation in the management and maintenance of Dublin City Council's Traveller specific estates and halting sites. Traveller Accommodation Unit staff meet various Residents Associations and community groups on site regularly on an informal basis but it is proposed to establish a more formal structure for these meetings to take place. It is also proposed to liaise with National Traveller groups who have a brief to design and deliver in-service training and capacity building for Traveller groups⁴⁶.

8.10 Approved Housing Bodies

It is the City Council's intention to actively engage with Approved Housing Bodies with regard to the future management, maintenance and development of sites and estates.

⁴⁴ Exchange House Submission - Appendix 4 Pages 55 and 56

⁴⁵ ITM Submission Appendix 4 - Pages 33 and 34, Finglas Traveller Development Group Submission Page 43, Pavee Point Submission Pages 50 and 51, HSE Submission Page 62, BTAP Submission Page 67

⁴⁶ ITM Submission - Appendix 4 Page 37, Finglas Traveller Development Group Submission Page 44, BTAP Submission - Pages 66 and 67, BTAP Submission Page 68

8.11 Emergency Facilities

It is recognised that ideally all families will be accommodated in accommodation suited to their needs at the earliest time possible. However, there may be a requirement for Emergency Facilities to be provided over the course of the programme for a variety of reasons and all cases will be considered as they arise⁴⁷.

8.12 Day-houses

Day-houses were originally designed to provide basic sanitary needs and were not intended to serve as general living areas. However, the purpose of these units has changed over the years and in recognition of this, Dublin City Council’s Traveller Accommodation Unit is in the process of redesigning the Day Houses to better cater for modern family living on all Halting Sites. Critical to this work is the consultation and agreement of the Travellers living on Halting Sites to the changes proposed so that an acceptable design for each Halting Site is achieved. Part of this upgrade will include a much larger footprint for the Day House than heretofore, future proofing toilet and bathroom facilities and the use of energy efficient technology including possible use of natural gas for heating, solar panels to reduce electricity costs and other energy saving initiatives⁴⁸.

As part of the redevelopment of Halting sites, Travellers who wish to change from Halting Site Accommodation to Group Housing Accommodation within sites will be facilitated insofar as is possible on the sites. However, all changes will be subject to planning and good practice guidelines.

8.13 Electricity Supply

The supply of electricity has been a problem at some sites over the years with outages taking place regularly for a variety of reasons. As part of the proposed refurbishment and upgrade, the City Council is committed to carrying out works to improve supply and safety issues. Associated with the proposed improvement works, an application will be made to the ESB for the provision of individual meters to all units to facilitate residents in having a direct relationship with the utility provider.

8.14 Fire Safety

Fire safety on all sites (authorised and unauthorised) is of paramount importance. The redevelopment of Traveller Halting sites and new builds will go some way towards addressing those needs. Dublin City Council currently provides and maintains, on an annual basis, fire safety equipment on all sites including home fire/smoke alarms, carbon monoxide alarms, fire blankets and fire extinguishers in all Group Housing sites, Halting sites, sanitation units and unauthorised sites across the city. Further enhancements on Halting sites, places where grouped sanitation units are provided and unauthorised sites include the provision of larger extinguishers on external poles to assist in the prevention of fire spreading. Dublin City Council are currently seeking options with regards to external alarms on Halting sites and unauthorised sites with a view to enhancing fire safety by providing an alarm that alerts all families on site to a potential danger. Further consultation will take place where overcrowding occurs to move mobile home in order to be compliant, to allocate under the Scheme of Lettings where appropriate or to build overcrowding extensions onto existing houses⁴⁹.



Bridgeview Group Housing Scheme

⁴⁷ ITM Submission - Appendix 4 Page 37, Pavee Point Submission Page 50, Exchange House Submission Page 56

⁴⁸ ITM Submission - Appendix 4 Page 37, Exchange House Submission Page 56

⁴⁹ ITM Submission - Appendix 4 Pages 37 and 38, Exchange House Submission Page 56

Section 9: Challenges and Positive Developments

9.1 Positive Developments

The Department of Housing, Planning and Local Government has made it possible to apply for small projects costing €2million or less to be recognised as single stage projects which has the potential to speed up the implementation process.

The 100% recoupment on costs for refurbishing Traveller Voids creates an opportunity for housing to be allocated to Traveller families. This has resulted in a total of 15 allocations to date with a further 3 in the pipeline.

New Frameworks designed for Traveller Specific projects allows for greater freedom and time saving in relation to projects. The new Sanitation Unit Framework 2018, the Management & Maintenance Framework 2019 and the Traveller Specific Capital Framework 2019 achieved with the other Greater Dublin Councils will ensure that contractors are already prequalified for projects. The Management & Maintenance Framework 2019 currently being completed will allow for greater efficiencies in the provision of maintenance on Traveller sites.

The Department of Housing, Planning and Local Governments Expert Review Group⁵⁰ (reviewing the Traveller Accommodation Act) on the Provision Traveller Accommodation established by Minister of State Damien English in late 2018 should provide valuable information and recommendations to influence and improve the provision of Traveller Accommodation into the future. The Expert Group is made up of Dr. Conor Norton (DIT), Prof Michelle Norris (UCD) and Mr. David Joyce (Mercy Law).

There is a willingness to build small housing groups in various areas subject to land availability. This tends to allay fears of large Traveller communities growing which have proved problematic in the past.

Build quality, changes in planning and renewable energy efficiencies such as solar energy and energy efficient electrical, heating etc. mean that Travellers can now avail of better quality homes with more space, cheaper bills and better health and living conditions.

9.2 Challenges

The challenges facing the Traveller Accommodation Unit into the future are:

- Sourcing suitable sites within the Dublin City Council administrative area for any type of accommodation remains challenging⁵¹.
- Sourcing suitable sites that will accommodate different family groupings/sizes in order to address unauthorised occupation of land especially around the Northern Fringe area.
- A cooperative action between neighbouring local authorities might benefit the provision of Traveller Accommodation in that the sharing of land and/or resources might give impetus to new builds⁵².
- It might be appropriate for the Department to consider an “on the ground” Departmental Liaison Officer to work with Local Authorities. The Liaison Officer should be of sufficient grade to work with and influence Traveller Accommodation Managers, Senior Executive Officers and Executive Managers and have practical experience of being onsite with Travellers to identify issues of concern and posit possible solutions.
- Consideration needs to be given to specific family groupings and their accommodation to prevent conflict/feuding during the allocation process.
- Unreasonable expectations regarding the provision of accommodation for Travellers. For example, it is not possible to have new accommodation ready for young Travellers who have just married given the current need to house 293 families. Traveller families can be very specific in their choice of house, street and area where they want to live. This limits options and does not provide equality with other housing applicants.

⁵⁰ BTAP Submission - Appendix 4 Page 67

⁵¹ ITM Submission - Appendix 4 Page 37

⁵² ITM Submission - Appendix 4 Page 36

- The current practice of moving from one Local Authority area and expecting accommodation to be provided is exacerbating an already overstretched system. A significant part of this problem is the transfer of perceived living rights to Group Housing properties and particularly bays between Traveller families. This can and has caused huge problems for Local Authorities in relation to the rightful and fair allocation of properties to those on the Scheme of Lettings. As such, resources more rightly spent on Traveller Accommodation or improving services to Travellers is used to remove illegal occupants from properties which have not been properly allocated.
- While a general reduction in the size of Traveller families is noted, due cognisance must be given to the size of existing Traveller families which are larger than families in the settled community. Therefore, future building must consider and possibly include a larger mix of 4-5 bed houses and much larger day houses to accommodate Traveller family living.
- Downsizing from 3/4 bed group housing to 1/2 bed is proving very difficult for older Travellers who cite memories in the house as the biggest obstacle to moving.
- Increased pressure on resources due to the high incidences of unauthorised occupations in Traveller Halting sites and Group Housing Schemes which creates overcrowding, fire safety and health & safety issues. This can be as a result of expanding families or Travellers from other areas moving onto sites.
- Increased pressure on resources due to illegal dumping, rubbish/copper burning etc.
- While at a senior level there is good cooperation between senior Local Authority management and the various relevant statutory agencies, at times the experience at local operational level can fall far short of the services requested or required.
- Standardising policies and procedures so that Travellers are treated equally under all housing legislation. For example, this means that Traveller must take some responsibility for small maintenance issues, conditions on site and the accommodation they live in.
- Funding for any projects each year must come from the current yearly allocated budget to the Local Authority. Traveller Accommodation budgets must be agreed by the Local Authority in advance and spend completed before a claim is made to the Department. A possible solution might be to front load funding based on yearly Commitments Table with a realistic defined timeline for spend. Remit for follow-up could also form part of Liaison Officer role if such is considered appropriate.
- It might be prudent to align the allocation of Departmental budgets with the Local Authorities. If Local Authority budgets are agreed in October/November and the Department allocation is not agreed until April/May of the following year, this delay can have a significant impact on monies spent. See previous point as possible solution.
- Projects are delayed due to:
 - 1) Last minute changes or challenges to projects
 - 2) Delays in the planning or tendering process
 - 3) Threats to staff and contractors resulting in withdrawal from sites
 - 4) Weather
 - 5) Abnormal or contaminated soil/structural findings on sites, removal of waste etc.
- Local opposition to Traveller Accommodation can be significant.
- Finding suitable Private Rented Accommodation can be extremely difficult for Traveller families.
- The allowance for maintenance costs have not been reviewed since 1997. The current allowance of €640 per unit per year is wholly inadequate. A more reasonable allowance would be in the region of €1,200 - €1,500 given the tender price index 2018, the 2017 Sectoral Employment Order (Construction Sector) and the increase in Preliminaries since 1997 relating to work of this nature.

Appendix 1: DRAFT Local Traveller Accommodation Consultative Committee Terms of Reference 2019⁵³

An introduction to the Terms of Reference:

Dublin City's Local Traveller Accommodation Consultative Committee (LTACC) was formed to advise the Dublin City Council in relation to:

- a) The provision of accommodation for Travellers.
- b) The preparation and implementation of the Traveller Accommodation Programme 2019-2024 for the functional area of **Dublin City Council**.
- c) The overall management of accommodation for Travellers.
- d) To provide a mechanism for transparency and accountability for the delivery of Traveller specific culturally appropriate accommodation.

Purpose

The purpose of the Dublin City LTACC is to drive the Traveller housing policy.

It is agreed by the LTACC, that under no circumstances will the LTACC be used as a forum to discuss issues such as the day to day management of Traveller accommodation and that discussion of individual accommodation cases will not feature within the scope of the work of LTACCs⁵⁴.

Frequency of meetings

There will be a minimum of six meetings per year⁵⁵. Additional meetings may be called by agreement if issues arise that need urgent attention.

When and if substructures are set up, all members will be informed as to when and where those meetings are to be held. In 2019, two such sub committees will be formed to deal with housing and waste management issues.

Administration of the LTACC

"Where an appropriate Traveller organisation or group of organisations exists or are otherwise available, agree a selection procedure to be administered by such organisation(s)."

The appointing local authority should make adequate resources, including staff, available to service the committee and having regard to the exigencies of the local authority should:

- as far as is practicable designate specific staff for this purpose, and
- avoid frequent changes of staff assigned this function.

Setting the Agenda

Standing orders will include:

- Traveller Accommodation Programme based on the monitoring template
- Connections to other committees such as the SHPC and Inter-Agency Groups
- Any urgent issues arising that have been communicated to the chair at least 3 working days before the meeting instead of adding "any other business"

The agenda will be sent out to the committee members at least ten working days before to facilitate preparation for the meeting, except the items for the agenda added through the chair as mentioned above.

⁵³ ITM Submission - Appendix 4 Page 33 and 34, BTAP Submission - Page 67

⁵⁴ BTAP Submission - Appendix 4 Page 67

⁵⁵ BTAP Submission - Appendix 4 Page 67

Minutes

The minutes should include the decisions made and actions to be taken with a timeframe and the responsible party recorded. Minutes should record why actions has not been achieved and the barriers to implementation.

Insofar as is possible, the minutes will be sent to the chair within a week of the meeting. Minutes should be posted to the Traveller representatives and elected representatives within two weeks of the meeting.

Communication and dissemination of information

Informal/non formal methods of disseminating information from the LTACC will be used by Traveller representatives through Traveller organisations by people calling into centres.

Copies of the minutes of the LTACC meeting will be made available for Travellers.

Copies will be sent to the Chief Executive of Dublin City Council, the relevant Assistant Chief Executive of Dublin City Council and the Executive Manager of Housing & Community Services.

Local groups will bring news from the LTACC to meetings with Travellers in their area.

Connections will be made with and provide the information to relevant committees such as the Strategic Housing Policy Committee, Inter-Agency Groups etc.

A seat on the LTACC is to be included for a representative on the HSPC as a specific link over and beyond the elected representatives nominated to the LTACC.

Minutes will be uploaded on the Dublin City Council Traveller Accommodation Unit website.

Confidentiality

All members of the LTACC should respect the confidentiality of the Committee members and its meetings. To that end, only approved minutes of the LTACC should be circulated. Communications between members of the Committee including emails, letters, memos etc. should be treated in confidence and in line with GDPR best practice guidelines.

Membership of the LTACC

The LTACC shall seek to have two Traveller representatives from each of the local areas: Ballyfermot, Ballymun, Clondalkin (covering St. Oliver's Park and Bridgeview), Coolock and Finglas (given that the Coolock and Finglas areas are so vast there may be two representatives from site groupings)⁵⁶.

Nomination procedures need to be inclusive and transparent and Traveller representatives appointed should be positioned to represent the overall Traveller population in each area.

The LTACC shall seek to have one representative from each of the Local Traveller Representative Groups to ensure that the LTACC are informed of Local Traveller needs, to support Traveller representatives and to inform Traveller Accommodation policies.

The LTACC shall seek to have councillors/elected representatives from each of the relevant areas.

A seat is allocated for a representative from the Housing Strategic Policy Committee (HSPC) in addition to the elected representatives nominated by the council. This provides for a reporting mechanism to the HSPC.

The LTACC shall "decide on a quorum for its meetings having regard to the requirements in relation to membership of committees as set out in Section 22 of the Housing (Traveller Accommodation) Act, 1998;" Guidelines for the operation of the LTACC.

The Chief Executive of Dublin City Council will be invited to attend a meeting once a year⁵⁷.

⁵⁶ Pavee Point Submission - Appendix 4 Page 49, HSE recommendation Page 59, BTAP Submission Page 66

⁵⁷ Pavee Point Submission - Appendix 4 Page 50

The Director of Housing will be invited to attend meetings with emphasis given for attendance when setting down targets and reviewing these.

Attendance

All members should make every effort to attend all LTACC meetings. If a member is unable to attend a meeting contact should be made with the Chair tendering apologies. If a member does not attend two consecutive meetings, the Chair will contact them to invite them to return or step down from their position so that they can be replaced.

Guidelines for the Operation of the LTACC

Work-plan

The overall objective of Dublin City's LTACC will be to ensure that the Traveller Accommodation Programme is implemented.

A monitoring template will be used with the work-plan listing: Objectives and Target Dates for Delivery of measures contained in the Traveller Accommodation Plan⁵⁸

Annual Report

The annual report will be drawn together by a sub-structure of the committee which has at least one City Council representative, one Traveller representative and one elected representative. A photocopy of the executive summary will be made available to the Traveller community. The full report will be sent to the City Manager and forwarded to the Traveller Accommodation Unit of the Department of the Housing, Planning and Local Government⁵⁹.

Audit, monitoring and evaluating

The Traveller Accommodation Programme will be monitored through the use of the template listed above. An audit of delivery will be carried out half way through the programme⁶⁰.

The Chair

The chair will be selected from either the public or Traveller representatives. There will be a rotating chair on an annual basis. An independent Chairperson can be appointed by the Appointing Authority if deemed necessary to increase and focus the functionality of the LTACC.

The Role of the Chair

- Aim to advance the work of the LTACC
- Would not seek to use the position of Chair to forward own agenda
- Allow everyone to participate (speak at least once and monitoring how long people can speak at a time. In small groups will let people talk and will prevent people from talking over each other).
- The Chair is to be formally ratified annually.
- The Chair is to follow up on attendance and any recommendations made at the meeting.
- They are to check the links with the HSPC.
- They are to report into the different structures e.g. council meetings, HSPC representative, other committees and other LTACC elected representatives.
- The Chair will link with the administration in the Traveller Accommodation Unit and issue letters/memos when required.

⁵⁸ HSE Submission - Appendix 4 Page 59, BTAP Submission – Appendix 4 Page 67

⁵⁹ Pavee Point Submission - Appendix 4 Page 50

⁶⁰ HSE recommendation - Appendix 4 Page 59

Appendix 2: List of Proposed Traveller Accommodation Projects – 2019-2024

Project	No. of Units	Costs 2019-2024*	Timeframe
Bathroom refurb disability access	1	€11,668.48	End 2019
Back yard refurb re H&S	3	€49,692.12	End 2019
Traveller Voids	5	€130,000	End 2019
Labre Park: Special needs refurb and extension	1	€215,000	End 2019
St Mary's Park: Overcrowding extension	1	€97,325	End 2019
St Mary's Park: New build	1	€350,000	End 2020
Naas Road	3	€997,000	End 2020
Reuben Street	1	€350,000	End 2020
Avila Park Community Centre demolition refurbishment & 3 House builds	3	€900,000	End 2020
**St Dominic's – Sanitation Units	23	€448,500 + services	2019/2020
**Tara Lawns – Sanitation Units	10	€195,000 + services	2019/2020
Grove Lane	5 houses & 5 bays	€2,380,000	2019-2020
Northern Close Refurbish & rebuild	11 + 1 new rebuild	€1,000,000	2019-2020
Labre Park Redevelopment Phase 2&3	24 houses and 2 bays	€12,500,000	2019/2021
Temporary Accommodation Site	10	€925,000	2019-2021
St. Margaret's Park Day-house upgrade	30	€2,567,000	2019-2022
Cara Park	6	€1,800,000	2019-2022
Cara Park	2	€600,000	2019-2022
Cara Park	1	€350,000	2019-2022
Reinstate Tara Lawns & Upgrade Dayhouses incl 4 temporary bays	10	€2,000,000	2019-2024
Reinstate St. Dominic's Park & Upgrade Dayhouses	23	€3,000,000	2019-2024
St. Oliver's Park Day-house & electrical upgrade	15	€2,240,000	2019-2024
St Joseph's Park Day-house & electrical upgrade	14	€2,240,000	2019-2024
Total Current Projects		€35,346,185.60	
Proposed Future Projects	No. of Units	Draft Costs	Timeframe
# Northern Fringe	15	€5,250,000	2019-2024
# Football Grounds St Margarets	7 Bays & 8 Houses	€2,900,000	2019-2024
# Kildonan Lands	12	€3,600,000	2019-2024
# Finglas Lands	16	€4,800,000	2019-2024
Special Needs /Overcrowding extensions	2 per year	€2,000,000	2019-2024
House Refurbishments	2 per year	€400,000	2019-2024
Traveller Voids	5 per year	€150,000	2019-2024
	47 new Housing Units 7 new bays 92 Day-house refurbishments 21 House refurbishments 10 extensions 25 Traveller Voids 14 Temporary Bays	€19,100,000	

All costings are indicative only and are subject to change⁶¹.

** Price does not include the provision or installation of services. Project subject to agreement from service providers.

⁶¹ ITM Submission - Appendix 4 Page 38

Appendix 3: Current Traveller Specific Housing Stock 2019

Name of Estate/Halting Site	No. of Houses	No. of Halting Bays
Labre Park	14	*20 Temporary Bays
Kylemore Grove	8	0
Bridgeview	10	0
St. Oliver's Park	1	14
Cara Park	29	8
Cara Close	12	0
Grove Lane	1**	0
St. Dominic's Park	0	#23 Vacant (23 Unauthorised occupying families)
Tara Lawns	0	#10 Vacant (10 Unauthorised occupying families)
Northern Close	11**	0
Avila Park	29	0
Avila Gardens	14	0
Avila Close	6	0
St. Margaret's Park	0	30
St. Joseph's Park	0	14
St. Mary's Park	10	0
Total	145	119

*Families currently living in temporary bays in Labre Park are due to be housed in the redevelopment of Labre Park by Cluid.

**Denotes sites with derelict houses. Grove Lane = 5 and Northern Close = 1⁶².

Unauthorised families currently living in bays in Tara Lawns and St Dominic's Park will be assessed for housing needs and under the redevelopments proposed in the area will become tenants under Dublin City Council⁶³.

⁶² All Submissions - Appendix 4 Pages 28-68

⁶³ All Submissions - Appendix 4 Pages 28-68

Appendix 4: Submissions

Submission 1 – CENA

Submission to the Development of the Traveller Accommodation Programme 2019-2024

October 17th 2019

Introduction

CENA Culturally Appropriate homes welcomes the opportunity to input in to the fifth round of the Traveller Accommodation Programmes (TAPs) CENA is a Traveller led Voluntary Accommodation Association. The name CENA is the translation of the cant term (Traveller Language) for home. The objectives of CENA are informed by the vision of an Ireland where all Travellers are accommodated in culturally appropriate accommodation that meets their needs and also fulfils Travellers right to a home within a sustainable community setting of their choice.

CENA FOCUS AND PRINCIPLES

The core focus of CENA will be on the provision of culturally appropriate housing for and with Travellers. The success of the organisation will be judged by the extent to which Travellers are accommodated in culturally appropriate accommodation that meets their needs and that achieves Travellers' right to a home within a sustainable community setting of their choice.

Successful development will depend, from the beginning, on the extent to which Travellers are able to:

- Understand the process involved and contribute positively and realistically to the planning and design process.
- Become organised as residents in a way that allows for effective self-representation during the planning of new developments and into the future.
- Take real responsibility of their own built environment in a way that ensures long-term sustainability, cohesion and enhanced access to local services, facilities and opportunities.

Success will also depend on the extent to which CENA is able to forge effective working partnerships with local authorities and work jointly towards the achievement of this vision.

This focus and approach has two major implications for the core operational model of CENA being proposed:

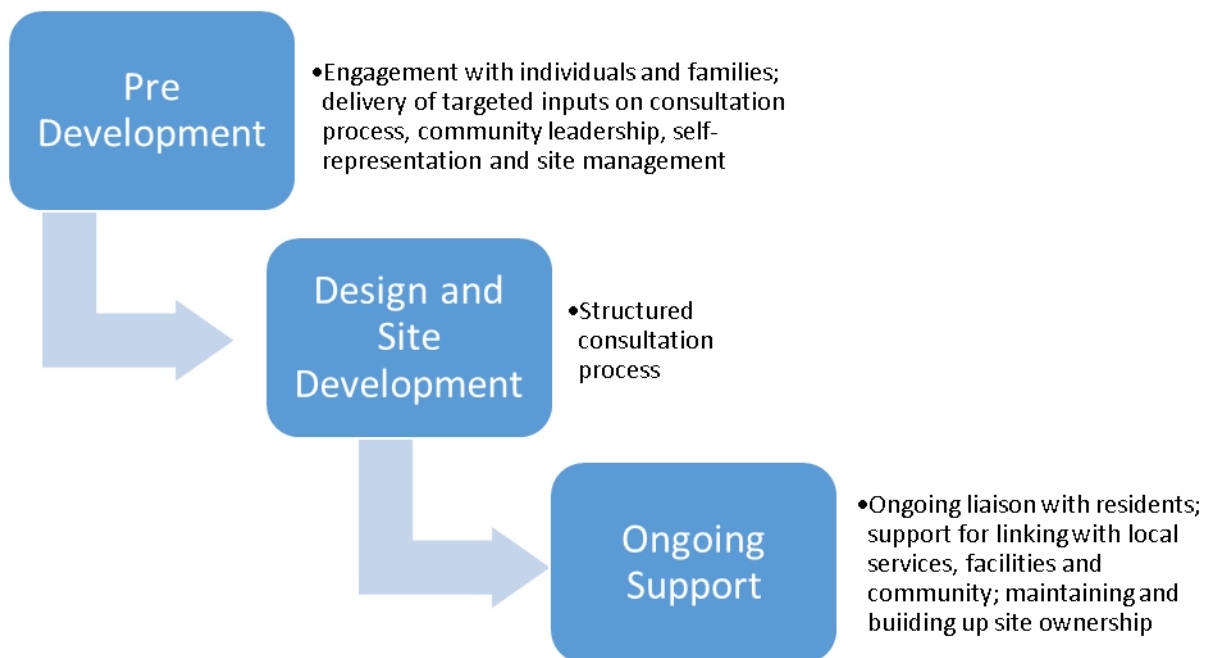
1. Firstly, and most importantly, we will create a 'Residents Education' function within the organisation. One full-time post will be created with a responsibility for:
 - a. Developing resources to guide the delivery of on-site educational programmes. These will address the key issues of self-representation, consultation, leadership and site management.
 - b. Overseeing the delivery of these programmes, either through direct delivery by CENA or delivery in partnership with local Traveller community development projects. CENA will be responsible for quality control of delivery in all cases.

c. Maintaining ongoing contact with residents in CENA-developed sites, providing support and advice where required to help sustain a cohesive community and good living conditions for all.

2. Secondly, each CENA development will include provision for a community facility, within which joint activities can be organized by residents and which can become the focal point for effective self-management of the site.

We envisage that the pilot projects, now underway, will provide insights and assistance for us in developing the resources and methodology we need to build on the model into the future. But it is already clear that the approach taken to all developments in the future will be a three-phased approach. Because we are committed to the creation of long-term sustainable and self-organising communities, CENA involvement cannot be restricted to the design and development phase of new initiatives. As is shown in the diagram overleaf, the organisation will also be equipped to actively engage with families and communities' pre-development (in a broader educational sense) and post-development (in an ongoing support capacity).

The CENA Model for Individual Site Development



The development model adopted bears some similarities to the standard model adopted by other housing associations. There are, however, very important differences that need to be acknowledged.

1. Firstly, the depth and nature of challenges being addressed are on a very different scale than exist within the standard accommodation field. Provision of culturally appropriate Traveller accommodation has persisted as a major challenge for successive governments over decades.
2. Success in meeting this challenge is determined by a range of factors that are not restricted to design, build environment or construction. Very real barriers exist in relation to social exclusion, marginalisation, low income and disconnection from progression opportunities for Travellers; lack of support and frequently open hostility from the settled community.

3. An effective response to accommodation issues must therefore encompass a developmental dimension that allows for purposeful engagement with Travellers, facilitates a learning and inclusion process and builds a sense of ownership around Traveller accommodation.

A Role for CENA in the Next Traveller Accommodation Programme

CENA is now in consultation with several local authorities. Our approach in each case is to:

1. Undertake an extensive consultation process with all Traveller families (or an agreed number in some cases) with a view to establishing their accommodation needs – not just in the short-term but with a view to the accommodation needs of future generations.
2. Develop a strategic plan, based on the needs expressed. The plan will include the identification of possible locations, a full costing and a time-line (allowing for short, medium term and long term targets)
3. Negotiation with the relevant local authority with regard to resourcing of the strategic plan (or part thereof) and the contractual arrangements based on this agreement.

We are asking all local authorities to declare their willingness to work with CENA, along the lines outlined above, as an integral part of delivering their Traveller Accommodation Programme.

Kind Regards,

Bridgie Casey

Accommodation Officer

Email: Bridgieitm@gmail.com

Mobile 087-6425756

Submission 2 – Irish Traveller Movement

Submission to the Development of the Traveller Accommodation Programme 2019-2024

Submitted by Irish Traveller Movement October 2018

Background

Established in 1990 the Irish Traveller Movement (ITM) is the national membership network of organisations and individuals working with the Traveller community comprising over forty groups. It is a partnership between Travellers and settled people committed to seeking full equality for Travellers in Irish society. This partnership is reflected in all its structures. A core principle is to challenge the racism that Travellers face within Irish society.

The Irish Traveller Movement welcome this opportunity to make a submission on the development of the new fifth round of the Traveller Accommodation Programmes (TAPs) the ITM and put forward key issues and recommendations, which we hope will guide the preparation and implementation of your Traveller Accommodation Programme as laid down within the Housing (Traveller Accommodation) Act 1998.

Both the DHPLG and the National Traveller Accommodation Consultative Committee (NTACC) recognise the role of local Traveller representative organisations as key players in supporting the new TAP.

Role in relation to Traveller accommodation

The Irish Traveller Movement is the key lead nationally working in the area of Traveller accommodation and employs two National Traveller Accommodation Officers. These posts are funded by the Department of Housing Planning Local Government. (DHPLG)

ITM works collectively to represent the views of Travellers and Traveller organisations at a national and international level. We develop policies, actions and innovative programmes to bring about change for Travellers in Ireland. We work to challenge the inequalities faced by Travellers by promoting Traveller participation and leadership locally and nationally, by developing and sharing best practice, developing evidence-based research to inform our work and building strategic alliances with all who are committed to a fairer Irish Society National Planning Framework Ireland 2040.

Our Vision

“An Ireland where Travellers are proud of their identity and with their ethnicity recognised, can achieve their fullest potential to play an active role in Irish society”

Approach

We work to achieve equality for Travellers in all aspects of their lives.

We will promote pride in Traveller culture & identity, within the community and to non-Travellers.

We will ensure that our members are actively involved in and lead our work.

We will produce evidence based solutions to address the issues affecting Traveller’s lives to positively impact on policies and laws that affect Travellers, especially in the National Traveller. Roma Inclusion Strategy (NTRIS) 2017-2021

We will develop innovative models to meet Travellers' needs to achieve equality in Irish Society.

We will sustain, grow and build a dynamic organisation to carry out all aspects of the Strategic plan.

National legislation Context

The Housing (Traveller Accommodation) Act, 1998, mandates all Local Authorities 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. Another mandatory requirement was the establishment of Local Traveller Accommodation Consultative Committees in each Local Authority area to advise on the provision and management of accommodation for Travellers, seen as positive step towards fully addressing and improving accommodation of Travellers local and nationally and also offered an opportunity for Travellers and Traveller organisations to become directly involved in discussion with Local Authorities and elected representatives on accommodation

17 years and four National Traveller Accommodation Programmes later, the key question to be asked is what has changed for Travellers.

There is crisis in accommodation nationally for Travellers and especially for those in need of emergency accommodation.

Travellers continue to live in poor conditions throughout Ireland on road sides, in temporary Halting sites and in overcrowded conditions with health and safety risks. This, despite statutory requirements. Travellers are 11 times more likely to become homeless and 50 times more likely to be discriminated by landlords ⁽¹⁾ There are 5 times the number of families sharing facilities since legislation to effect - accounting for 4,460 people in overcrowded halting sites and in standard housing. ⁽²⁾

A Government review of Traveller accommodation provision 2000-2016 found consistent local authority underachievement of targets (only 68 % of units provided in that time) and 55 million Euro of allocated budgets unspent. While under delivery on mandatory targets wasn't happening many Travellers families were forced into the private rented sector (162 families in 2002 to 2,387 in 2017) rendering increasing numbers homeless and fuelling the accommodation crisis further. ⁽²⁾

Homelessness is now a common experience for many Traveller families, a particularly fast-growing trend across all local authorities. Local government practice /and the profile of the Traveller community (considering early marriage and new family formation) would indicate that the situation has reached crisis levels.

On the 16th May 2016 the **European Committee of Social Rights** found Ireland to be in breach of its obligations in this respect: with regard to provision of accommodation, living conditions and eviction rights. Specifically, the Committee concluded:

1. Unanimously that there is a violation of Article 16 of the Charter on the grounds of insufficient provision of accommodation for Travellers;
2. Unanimously that there is a violation of Article 16 of the Charter on the grounds many Traveller sites are in an inadequate condition;

3. Unanimously that there is a violation of Article 16 of the Charter on the grounds that the Criminal Justice (Public Order) Act 1994 (as amended) provides for inadequate safeguards for Travellers threatened with eviction;
4. Unanimously that there is a violation of Article 16 of the Charter on the grounds that the Housing (Miscellaneous Provisions) Act 1992 (as amended) provides for inadequate safeguards for Travellers threatened with eviction;
5. Unanimously that there is a violation of Article 16 of the Charter on the grounds that evictions are carried out in practice without the necessary safeguards;

Consultation Process

The ITM 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

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.

ITM also recommends the following: The position of Chairperson should be reviewed at the end of the second year of appointment; this position should be rotated around members of the LTACC, elected and non. In accordance with best practice work ethics the position of Chair and Vice Chair should not be held by people in the same category of representative roles i.e.: two officials, elected reps or Traveller reps.

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.

Section 42 of the Irish Human Rights and Equality Act 2014 has established a positive duty on public sector bodies to:

- Eliminate Discrimination
- Promote Equality of Opportunity and treatment
- Protect Human Rights

This means that 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, Called the public-Sector Equality and Human Rights Duty.

Noting the recognition of Traveller ethnicity by the Government

On the 1st of March 2017 Taoiseach Enda Kenny announced formal recognition of Travellers as an Ethnic Minority group within the Irish State. In recognising the Traveller community's cultural rights. That Traveller Specific Accommodation is respected and supported in this new reality within the Housing needs & Traveller Accommodation programmes.

Statement of Strategy

The 5th TAP should be bound by **SMART** principles, **S**pecific, **M**easurable, **A**chievable, **R**elevant and **T**ime 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. It has been the experience of the ITM based on the previous TAPs that a number of issues are emerging, such as land stock, land acquisition, CPOs and transfers and maintenance of property and land between urban and rural functional areas. If land acquisition is a barrier to the provision of Traveller specific accommodation in your area, this should be explicitly stated in the Strategy Statement along with proposals to address land shortage issues. For example, proposals or intentions for CPO's and transfers between adjoining urban and rural authorities. Where possible, locations should be named so that the TAP is capable of being implemented. It should also be noted that Local Development Plans should outline the objectives of TAPs as stated in Section 26 & 27 of the Housing (Traveller Accommodation) Act 1998. For your TAP to be realistic and achievable it is important to get the programme right from the start by addressing any issues or obstacles that may be present.

Assessment of Needs

The ITM 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 in to 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.

Allocation of Accommodation

A fair and transparent allocation of accommodation is a key feature of the Traveller Accommodation Programmes. The ITM recommend that all

- local authorities adopt and implement a scheme of letting priorities based on a points system for allocating accommodation to applicants on waiting lists. A points system will bring openness and transparency to the allocation process.
- Housing authorities must not operate separate waiting lists for Traveller applicants to standard housing. The use of dual lists gives rise to concerns of quota systems and ignores the real need that exists for many Traveller families.
- The ITM question the legality of quota clauses in Traveller Accommodation Programmes and recommend that such clauses are not included in TAPs or form any part of Traveller accommodation policy. The ITM are of the view that such clauses are discriminatory against Travellers, as they impose an added requirement on Travellers when seeking accommodation which would not be placed on a member of the settled community. This is contrary to the Equal Status Act 2000 and successfully challenged in Court.
- As part of a scheme of letting priorities to Traveller specific accommodation including Groups Housing and Halting Sites, compatibility with existing tenants of such accommodation should be considered as one of the criteria of the scheme. Furthermore, the ITM recommends that management issues with existing Traveller specific accommodation should not be a reason to delay or postpone the development of new accommodation. ITM is of the view that this would also be contrary to Equal Status legislation.

Provision of accommodation for Nomadism Families

Traveller Nomadism plays a vital role in social, economic and culture way and is part of who and what Travellers are. In 2002, in advance of a general election, Section 24 of the Housing (Miscellaneous Provisions) Act was brought into law making it a legal offense to be on private or public lands.

The then Minister reassured that this legislation would not apply to Traveller families camped on the roadsides. In actuality, when legislation was passed, implementation was swift by some local authorities and many Traveller families were evicted from public lands and their homes confiscated, rendering them homeless and facing prosecution.

The Housing (Traveller Accommodation Act) 1998 recognised the need for transient sites as one of a range of accommodation options for Traveller families. The Act reflects the recommendations contained in the Report of the Task Force on the Travelling Community 1995, which recommended a network of one thousand units of transient sites throughout

Ireland. The Report stated, “transient accommodation should be provided simultaneously with the other types of accommodation”. Currently there are fewer than 50 Transient sites in the republic and almost all are in use for emergency accommodation.

Successive Traveller Accommodation Programmes over 17 years have failed to provide for nomadism and legalisation has curbed a central component of Traveller ethnicity, making it a legal offense.

The Irish Traveller Movement has consistently called for Transient Accommodation to be provided as an integrated part of a National Traveller Programmes, however this has been met with a lack of political will at local and national level.

In practice Travellers are no longer able to travel (be nomadic) for fear of imprisonment, loss of their family home which has affected their social, cultural and economic rights since the introduction of section 24 of the (Housing Traveller Accommodation Act 1998).

Travellers have been forced to accept forms of accommodation more politically acceptable and which have not met their needs as a minority ethnic group.

What is Needed Now

1. We call for Repeal of Section 24 of the Housing (Miscellaneous Provisions) Act 2002 prohibiting nomadism, a core element of Travellers cultural and way of life.
2. We call for the provision of a network of transient halting sites in each local authority area for short stays that would be exempted under Section 4 of the Planning and Development Act 2000.
3. We call for transfer arrangements between Traveller families that are negotiable with the relevant local authorities.
4. The Irish Traveller Movement call for greater supports and assistance for families negotiating their own accommodation on private lands/ sites.
5. We call for the identification of public land for temporary camping purposes for families during different times of the year.

Transient halting sites, as defined in the Housing (Traveller Accommodation) Act 1998 refers to sites for Travellers with limited facilities for use other than their normal place of residence. The 1998 Act places a specific obligation on Local Authorities to provide for the annual patterns of movement of families. This not only requires Local Authorities to refrain from taking measures that would inhibit Nomadism but also places a positive obligation on the Local Authority to provide services to facilitate Nomadism.

- The ITM submits that the local authority has a statutory duty to address the provision of transient sites within TAPs and should be an integral part of a local authority’s accommodation plan; It is noted that the United Nations on Ireland’s reporting on the International Covenant on Civil and Political Rights recommended, at paragraph 23, *that Ireland enacts amending legislation which would meet the specific accommodation requirements of Travellers.* A positive step towards responding to

this recommendation is by putting in place transient type sites which will promote the Nomadic way of life.

The ITM offer their support in working with local authorities in conjunction with the **Traveller Accommodation Unit (TAU)** and NTACC in regard to progressing local accommodations options for nomadic families when required.

Traveller Families in Crisis Accommodation.

There is crisis in accommodation nationally for Travellers, especially for those in need of emergency accommodation. Despite statutory requirements Travellers continue to live in poor conditions throughout Ireland on road sides, in temporary Halting sites and in overcrowded conditions with health and safety risks. Travellers are 11 times more likely to become homeless and 22 times more likely to be discriminated by landlords ⁽¹⁾ There are 5 times the number of families sharing facilities since legislation to effect - accounting for 4,460 people in overcrowded halting sites and in standard housing.

Recommendations

- We call for Traveller-specific emergency accommodation hubs in each local authority area, in recognition of the high level of discrimination experienced by the Traveller community
- We call for additional facilities for Traveller families sharing and in overcrowded Traveller accommodation, to be brought up to standard requirement in relation to sanitation and facilities.
- We call for a refurbishment programme that will prioritize some of the worst sites and group housing schemes in the country. This refurbishment Programme would bring a significant amount of families into a higher standard of living.
- We call for Traveller accommodation “out of use” in recent years to be reopened and refurbished by local authorities in consultation with the Traveller community.
- Reinstate the Caravan Loan Scheme for Travellers in TAPS 2019-2024
- We call on Local Authority County Managers to use their emergency powers to provide emergency accommodation to families living on roadside encampments pending permanent 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.

Fire Safety in Traveller Accommodation

A fire at a Halting Site on the Glenamuck Road, Carrickmines, Dublin in the early hours of the 10th of October 2015 killed 10 people from the same extended family, which included five adults and five children. This tragic loss of life highlighted the critical importance of fire

safety in Local Authority Traveller accommodation. This tragedy reminds us all, that fire safety is the responsibility for everyone, Especially the local authority.

Following the review of fire safety in Traveller accommodation by the National Directorate for Fire and Emergency Management NDFEM Sept 2016. The ITM acknowledged the work done at that time to improve fire safety at Traveller specific accommodation, but raised concerns that Travellers were still not safe enough in their accommodation and a priority focus to the issue of overcrowding.

In 2017 there were 5 times the number of Traveller families sharing - **accounting for 4,460** people in overcrowded halting sites and in standard housing.

The configuration of temporary and overcrowded sites plays a part in fire access and general safety, the NDFEM report found *The Configuration of Adjacent Units within pitches/ bays was determined to be an issue affecting 54% of the sites appraised.* The separation distances between mobile homes in many halting sites is a serious cause of concern. The review undertaken examined only **(57%) of the sites** throughout the country and *of these only 35% had remedial steps undertaken.* Long term issues raised with local authorities and the Department of the Environment relate to barriers erected at halting sites as a potential hazard for fire and emergency services and the report found that *access restrictions were identified at 31% of the sites appraised.*

The Irish Traveller Movement reiterate the importance of progressing the fire safety initiative nationally to its full conclusion in Traveller accommodation with an objective to improve the consultation and implementation process and prioritise incomplete targets and redress overcrowding and separation distances. However, in the case of three sites during the 2016 review, the remedy to the problem by each local authority was to evict the families affected. This should not be used as the solution to a problem largely caused by a lack of provision. The network of local Traveller organisations are willing partners in any safety work planned and a gateway to any process of consultation with families in remedying fire or safety issues.

Budgets

Each local Authority should provide costing for the full implementation of the Traveller Accommodation programme 2019-2024, this should include Maintenance, Capital projects and any other allocations to support TAPs.

For Further Information, contact:
Bridgie Casey
Accommodation Officer
01-6796577

For Further Information contact:
Bernard Joyce
Director ITM
01-6796577

Submission 3 – St Margaret’s Travellers Community Association

Submission to Dublin City Council for Traveller Action Programme 2019-2024

Introduction and background to the Project

St. Margaret’s Travellers Community Association (SMTCA) is based in St. Margaret’s halting site, Ballymun and its target group are Travellers living in the Ballymun area. Travellers have been living in the Ballymun area for more than sixty years and are an established part of the local community. In 1975 Travellers were moved from their site near the library on Ballymun road to St. Margaret’s road. Other Traveller families also came, mostly from the Finglas area. The Families settled on land on three locations in relatively proximity to each other and close to the current location of St. Margaret’s halting site. Over several years, the Travellers on St. Margaret’s road called for improvements in the accommodation facilities provided by Dublin Corporation. Alliances were formed with residents, community groups, local schools, religious and others to lobby for improvements. Eventually the authorities built the current St. Margaret’s halting site which was opened in 1997. The development included a Community Centre and pre-school on the site. The site has 30 bays and was designed to accommodate 30 families. St Margaret’s Park has been badly affected by overcrowding over the years with up to 66 families living in a space designed for 30 families. In July 2006 the situation was eased somewhat when 20 families from the site moved to new homes close to the site. In more recent times the overcrowding issue in St. Margaret’s has been exacerbated due to the increase in rental accommodation and the cap on rent allowance. As a result, more, young Travellers are staying on the site or indeed moving back to share accommodation with their relations. At present there are 37 families living on St Margaret’s, so overcrowding is a major issue. There are also problems with sewage problems and issues around lack of maintenance such as regular withdrawal of site services by DCC TAU all with obvious negative effects on the residents of St Margaret’s.

Accommodation.

DCCs proposed plan to redevelop St Margaret’s Park is welcome and long overdue. The architect’s drawings were presented to residents and agreed on at meetings from April to June 2018. However, residents have ongoing concerns about the proposed work. At present there are 37 families in St Margaret’s Park, which was built to accommodate 30 families. The new development will only allow for accommodation for 30 families and residents are calling for a solution to cater for the extra 7 families to be put in place prior to any redevelopment of the site. SMTCA calls on DCC within this submission to honor the commitment made by Ballymun Area Manager, Mary Taylor, at a residents meeting in SMTCA (September 2017) to nominate one of the identified parcels of land in Ballymun to provide homes for Traveller families in Ballymun who will be displaced with the new developments. There is also a need to plan for the near future accommodation needs of Travellers in Ballymun. A number of young people have or will soon be reaching the age when they will get married and need to be accommodated as new households. There is also the fact that while the number of Traveller Families stands at 37 the actual figure is much higher. 12 Traveller Families from Ballymun are on the homeless register and have places in hotels where they stay each night. However, during the day, they come back to St. Margaret’s to spend time with their relations or to bring their children to the local schools. This adds to the overcrowding issues on site

and underlines the need for more units of accommodation for Travellers in Ballymun. SMTCA also calls on DCC TAU to review the current architects 'proposed drawings of St Margaret's park and look at the possibility of reconfiguring the current site to include the extra land that will be available from development of the DCC waste and recycling depot that is being constructed opposite St Margaret's Park. This land would allow for the expansion of bays thus reducing the need for the proposed fire walls between the bays that residents have expressed huge concerns about since the last meetings with DCC. Residents are concerned about the long-term health implications of having to live surrounded by huge oppressive walls. It has long been noted that Travellers suffer much higher rates of suicide, depression and mental health issues than the settled. Residents fear that these health issues will be exacerbated by the installation of these walls

Employment

The proposed Waste Facility Depot to be built adjacent to St Margaret's Park will provide opportunities for employment in general. We propose through the TAP that Dublin City Council will ring fence a quantity of paid employment opportunities for residents in St Margaret's Park together with a sustainability package which will provide residents with training opportunities to the skill sets required for employment in the Depot going forward.

Health and Safety

SMTCA call on DCC TAU to install traffic calming measures in the surrounding areas to St Margaret's and/or update existing measures in the area.

Submission 4 - TravAct

TravAct Proposals for Travellers Accommodation Plan 2019-2014

Date: 24 Oct 2018

Cara Park/ Cara Close

1. We propose that suitable sites be developed for Traveller specific group housing to meet the needs of thirty five families in Cara Park. Eight of these families are in units that were intended to be a short term solution, five years later the families in these units are still waiting to have houses.
2. There are also thirteen families who are in the back of family homes waiting to be accommodated.
3. There will be twenty young people from Cara Park/ Cara Close getting married over the next two years and they will need separate accommodation over next 2 years.

Northern Close

4. Northern Close will have thirteen young people getting married within the next two years and they will also need separate accommodation over next 2 years.

Tara Lawns

5. Tara Lawns is very run down at present and there is a great need to have this site refurbished for the families who are living on this site and other families who are waiting for accommodation.

St Dominic's

6. St Dominic's site needs urgent re-development and plans for this may be prepared in consultation with the families that are currently on the waiting list.

Grove Lane

7. Plans for Grove Lane may be discussed in detail during the forthcoming meeting on 31 Oct 2018 with Pat Teehan.

Unofficial Sites in TravAct Areas

8. Families currently residing on unofficial sites should be provided appropriate supports in terms of electricity, sewage disposal and flood-prevention arrangements to prevent these families becoming homeless. These arrangements must continue until all these sites are re-developed.

Northern Fringe development

9. When the plans for the Northern Fringe development are getting drawn up we propose that Traveller specific group housing and sites must be included at the outset in these plans.

Submission 5: Finglas Traveller Development Group

Submission to Dublin City Council re: Traveller Accommodation Plan 2019-2022

The Finglas Traveller Development Group welcomes the opportunity to make a submission in relation to the Dublin City Council Traveller Accommodation programme 2019-2022.

The Finglas Traveller Development group is a representative body working under the principles of community development with a voluntary management committee consisting of members of the local Traveller Community in Finglas and interested statutory and community organisation stakeholders. The community development worker is currently employed by the Finglas Centre and is directed by the work-plan designed by the Finglas Traveller Development Group.

A key area of work remains to be in relation to Traveller Accommodation. This entails working within a participatory empowering strategy to on the one hand advocate on behalf of the community, while, on the other hand to support the community to engage with Dublin City Council officials and relevant bodies to further accommodation issues.

This submission will focus on Avila park group housing scheme, St. Joseph's Park, Dunsink Lane and St. Mary's Park, Dunsink Lane.

All information gathered was obtained by calling to each home and carrying out group and one to one consultations with residents where necessary.

In this submission we wish to highlight:

- 1) Current overcrowding in Avila park group housing scheme and projected need.
- 2) Outline issues pertaining to the re-development / de-commissioning of St. Joseph's Park, Dunsink Lane
- 3) Extension of St. Mary's Park, Dunsink Lane.
- 4) Make recommendations for the 2019-2022 TAP.

Avila Park Group Housing Scheme

Avila Park Group Housing scheme currently comprises 49 houses in total with differing designs based on the year of construction and other specific requirements.

In total 71 households live in the Avila Group Housing scheme.

Avila close comprises 6 households (numbers 1-5) with one mobile unit at the end of the site. There are a total of 21 residents in Avila close.

Avila Gardens comprises 20 households numbers 1 -14 with mobiles to the rear No.1, No.3, No,7, No, 9, No 11, No, 14. There are a total of 62 residents in Avila Gardens

Avila Park comprises 45 households numbers 1-30 with mobiles to the rear of No.4, No.5,

No.7, No. 8, No.19, No.20, No,22, No. 23, No. 25, No. 26 x 2 mobiles, No. 27, x 2 mobiles, No 28, and No. 29.

There are a total of 149 residents in Avila Park.

Recommendations for Avila Park Group Housing Scheme

- A one bedroomed house be built on the site that currently houses a family in a mobile home on a vacant site in Avila close.
- Demolish the community centre and build One 4 bedroomed house to facilitate a family with medical needs and overcrowding. Two x 1 bedroomed houses to be starter homes or offered to older people currently occupying 3 / 4 bedroomed houses on the site. This could free up family homes for others on the list for Avila.
- On completion of new 4 bedroomed build no. 2 Avila Gardens to be refurbished and offered on a needs basis to family currently waiting to be housed in Avila park
- The Accommodation of 22 families currently doubling up in yards on site needs to be addressed in the next TAP programme. Any re- development of the Kildonan lands in Finglas should allow for up to 30 homes for Travellers currently doubling up in yards in Avila Park Group housing.
- To ensure the implementation of fire Safety regulations through consultation with residents.
- Advocates should undertake to do a body of work that reflects the real housing need and to ensure that every person that is entitled to Traveller specific accommodation is accounted for. Often families living in yards are not accounted for, for fear of rent increases. This work could be done in collaboration with the Traveller Accommodation unit.
- The building of relationships between TAU and Travellers needs consideration. Advocate to work with residents to form a residents committee that will link in directly with TAU. The free flow of information between both parties is pivotal to successful estate management.
- Implementation of painting programme to outside of estate and walled areas inside.

St. Joseph's Park, Dunsink Lane, Dublin 11.

Background and current profile on St. Joseph's halting site.

St. Joseph's park is an official halting site which was redeveloped in 1996. This site is on land owned by Fingal County council and this has negative consequences for the residents. There are 14 bays each has its own unit which contains a toilet and shower, with space for a washing machine and fridge. St. Josephs was to be re-developed under the current TAP programme but has been unstable and faced a lot of anti- social behavioural issues which often led to DCC not working on site. There has always been and continues to be issues with services. Water and sanitation being most affected. Residents on St. Joseph's have had no postal service for a number of years and ambulance services don't attend without a Garda presence. Dunsink Lane continues to face issues with anti-social and dumping leaving

residents of St. Joseph's most affected by it because it is at the end of Dunsink Lane, and has little or no Garda presence.

Of the 14 bays, 10 are currently occupied with no immediate plans to occupy the remaining bays. This decision was made in consultation with residents who wish to continue to enjoy the current stability.

The bays are occupied as follows:

No 2. One single man

No. 4 Married couple (seniors)

No 5. One single man

No 6. One single woman

No 7. Separated father with access to 2 children under 10years

No 8. Married couple with 2 children under 4 years

No 9. Separated father with access to 4 dependent children under 14years

No.10. Married couple with 2 children under 6years

No.13. Married couple (seniors)

No.14 Married couple (expecting 1st child)

Recommendations for St. Joseph's Park, Dunsink Lane

- Dublin city Council should apply pressure from the most senior position to Fingal county council to ensure that Dublin city council residents are living in conditions that comply with normal health and safety regulations. There are clear issues due to straddling the two boundaries between councils that should not affect residents. Finglas Traveller Development Group calls for greater collaboration between the two county councils to benefit those household residents on the lane.
- To secure land on Dunsink Lane to provide housing for residents of St. Joseph's park
- Meaningful consultation and information sharing with residents should be a priority in the future re-development / decommissioning of St. Josephs Park.
- As with any recommendation those made in the next TAP 2019-2022 should be measurable, specific and achievable. Progress against these actions should be monitored.

In this context Finglas Traveller Development Group wish to add that consultations in relation to the future of St. Joseph's Park have taken place between residents, DCC Traveller

accommodation unit and Finglas Traveller Development Group. All meetings have been recorded and one to one consultations re housing preference were signed by residents and witnessed by a staff member of the TAU.

St. Mary's Group Housing Scheme, Dunsink Lane.

St. Mary's Park comprises 11 households, 10 houses and one mobile to the side of No 1.

All 11 households are occupied by family units.

Recommendations:

- To build a house at the side of No.1 to suit current residents on a needs basis.
- To acquire land from Fingal County council to build an additional 4 houses to allow for the projected need within the next TAP 2019-2022 for residents of St. Mary's group housing scheme.
- To ensure there is collaboration with Fingal County Council to ensure that health & safety standards on Dunsink Lane are being met for residents.

To conclude Finglas Traveller Development Group would like to question why actions detailed in the current TAP 2013-2018 have not come to fruition and for Dublin City Council to give assurance that any agreed future actions will be measurable, specific, achievable, monitored and that there will be accountability for failure to implement within reason.

Finglas Traveller Development Group

The Abigail Centre

106 Kildonan Road,

Finglas

Dublin 11.

Contact: Angela O'Neill (Coordinator)

e-mail angelaftdg@gmail.com

Phone 01-5493761

0894110454

Submission 6: Pavee Point



PAVEE POINT

TRAVELLER AND ROMA CENTRE

Submission to Local Authorities Traveller Accommodation Plans 2019-2024

(August, 2018)

Pavee Point Traveller and Roma Centre

Pavee Point Traveller and Roma Centre ('Pavee Point') have been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. The group is comprised of Travellers, Roma and members of the majority population, who work together in partnership to address the needs of Travellers and Roma as a minority ethnic groups experiencing exclusion, marginalisation and racism. Working for social justice, solidarity, and human rights, the central aim of Pavee Point is to contribute to improvement in the equality of life and living circumstances of Irish Travellers and Roma, this includes access to safe, affordable and culturally appropriate accommodation.

For further information, contact:

Ronnie Fay, Co-Director
Director

Ronnie.fay@pavee.ie

Tel: +353 1 878 0255

Martin Collins, Co-

martin.collins@pavee.ie

Tel: +353 1 878 0255

Context

We welcome the opportunity to make this submission to Local Authorities on the fifty round of Traveller Accommodation Plans 2019-2024. This brief submission comprises two sections. The first section identifies the current context; the emerging issues and challenges we identify in addressing Traveller accommodation needs. The second section provides a checklist for Local Authorities in finalising their TAPs with an explanatory context note relation to the question.

Many Travellers continue to live in very poor conditions and an unsafe physical environment. There is often a high level of overcrowding; damp problems; pest infestation and lack of basic facilities such as sewerage, public transport, paved roads, pedestrian pavements and electric lighting. Illegal dumping and intermittent rubbish collection are problems highlighted by Travellers. Poor site design and drainage problems as well as environmental hazards from land adjoining Traveller accommodation are concerns for Traveller residents. The All Ireland Traveller Health Study (AITHS) documented that few Travellers own their homes (less than 13% compared to 70% of other medical card holders). Some Travellers live under a constant threat of eviction. A quarter of families considered where they lived to be unhealthy or very unhealthy and 26.4% considered their place of residence unsafe.

Traveller accommodation remains a contentious area of public policy in Ireland. There has been some policy and legislative improvements in relation to Traveller accommodation in recent years but the main outstanding issue in Traveller accommodation is the gap between agreed policy at national level and the implementation of this policy by the Local Authorities that are responsible for the delivery of Traveller accommodation at local level. Among the many issues are apparent gaps and weaknesses in government policy; the overall approach adopted by government in relation to Traveller accommodation; the racism and discrimination experienced by Travellers in Irish society and the gap between agreed policy at a national level and implementation at a local level. The impact of austerity on the Traveller accommodation budget is of huge concern. Many political choices were made under the guise of austerity with hugely disproportionate cuts affecting Traveller specific services in addition to the general cuts in public services that Travellers also endured. The Traveller accommodation budget was cut from €40m in 2008 to €4m in 2013; a cut of 90%. Even more shocking was the fact that there was an overall underspend of 36% in the Traveller accommodation budget allocated from 2008-2012. While we welcome the recent increases in Traveller accommodation (currently a capital fund of €12 million) provided by the Department of Housing, we also note the massive underspend of those budgets by Local Authorities (*see Appendix); with only 10 out of 31 Local Authorities spending **some** of their allocated budget in 2018.

Delivering TAPs and utilising budgets

Furthermore, according to an independent review commissioned by the Department of Housing, Planning, Community, and Local Government, the majority of Local Authorities have consistently failed to meet their targets and provide adequate and culturally appropriate accommodation for Travellers since they were made mandatory 18 years ago. The report also found that more than €55 million provided for Traveller housing remains unspent since 2000 and just 6,394 of the 9,390 – or 68% of units of Traveller accommodation

promised have been provided. Additionally, the report identified key challenges facing Local Authorities in implementing their TAPs, including

- Planning issues, specifically in relation to opposition to planning applications by settled residents and Elected Representatives, as identified by Traveller and local authority representatives;
- Providing an effective assessment of need process, as the consultation highlighted the current process underestimates need; and
- Delivery of effective monitoring and reporting processes.

Consultees highlighted that the planning process is the most significant issue limited the delivery of capital output under TAPs. It was reported by Traveller representatives and local authority representatives that objection from local “settled” residents and political pressure exerted by Elected Representatives tend to delay the planning process. It was suggested that this can have a direct impact on the achievement of targets, as developments may face extensive delays, hence, the opportunity to utilise funding is lost.

Overcrowding and homelessness

The lack of delivery of TAPs has caused severe overcrowding, with Travellers essentially ‘doubling up’ or sharing accommodation with extended family members. This is not a sustainable solution and exacerbates the already overcrowded conditions in which Travellers are forced to live in. This can create conditions for internal conflict, fire hazards, unnecessary accidents and conflict with residents living in close proximity. It also could be used as a justification for evictions by Local Authorities. This has occurred on a number of occasions post- Carrickmines regarding a national fire safety audit in Traveller accommodation. Audits were applied systematically across the country to ensure that practical and appropriate fire safety measures were in place and taken to prevent loss of life and serious injury in local authority Traveller accommodation. Despite receiving an assurance that the audits would not result in forced evictions, Traveller organisations note that a number of evictions have taken place, leaving families homeless or forcing people to stay at homes and bays of extended family members. In 2016, 23 families were evicted from Woodland Park, a halting site in Dundalk, on the basis of fire safety concerns. This is in the context of a national accommodation crisis, of which Travellers represent 9% of homeless people in Ireland, yet only make up less than 1% of the population.

Ireland’s lack of action on Traveller accommodation has been met with scrutiny both nationally and internationally by human rights organisations and monitoring bodies. Recent findings by The European Committee of Social Rights (ERRC v. Ireland ECSR decision, may 2016) note that while significant progress has been made in the area of Traveller accommodation, the ECSR found a number of violations of the charter on the following grounds:

- Insufficient provision of accommodation for Travellers: of 1,000 “transient bays” identified as needed by a 1995 task force, however there are only 54 in existence and not all function as proper transient sites; the Traveller community has also grown in the meantime

- Many Traveller sites are in an inadequate condition: a “not insignificant number” of sites are in poor condition, lack maintenance and are badly located; reported problems included lack of water, poor refuse collection and problems with damp, flooding and sewage
- Legal safeguards for Travellers threatened with eviction are inadequate: Relevant legislation fails to provide for adequate consultation or notice or a requirement to propose alternative accommodation; there is also no legal aid available and limited access to judicial review

In 2011, the European Commission adopted an EU Framework for National Traveller/Roma Integration Strategies focusing on four key areas: education, employment, healthcare and housing. EU Member states have made a commitment towards promoting Travellers/Roma inclusion through the development of National Traveller/Roma Integration Strategies. The National Strategy of each Member state is assessed by the European Commission on an annual basis.

Following a revision of its first strategy, *Ireland’s National Traveller and Roma Inclusion Strategy (NTRIS) (2017-2021)* was approved by Government on 30 May 2017 for commencement of implementation with immediate effect. Underpinned by the Ten Common Basic Principles on Roma Inclusion and name Cross-Departmental Strategy sets out a framework with key priority areas and associated actions to ensure Traveller and Roma inclusion in Ireland. Central to this strategy is the implementation of key actions and objectives in relation to accommodation, including:

1. The adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers; and
2. The delivery of Traveller accommodation to be underpinned by a robust monitoring and evaluation framework, with a view to ensuring full expenditure of funds allocated for Traveller specific accommodation

The Department of Housing, Planning, Community and Local Government and Local Authorities are named as key drivers in implementing these actions.

Key Recommendations

1. Development of robust and accountable TAPs

- Development of TAPs must be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Annual reports to be developed by Local Authorities to monitor progress and submitted to the Department of Housing Planning Community and Local Government
- Chief Executive Officers of each local authority to present annual TAPs reports to the Joint Committee on Housing, Planning and Local Government
- Implementation of guidelines developed by the National Traveller Accommodation Consultative Committee in all Local Authorities

2. Ensure functioning LTACC, inclusive of active Traveller participation and representation

- Traveller organisations to nominate representatives to LTACCs; where Traveller organisations do not exist, National Traveller organisations to support nominations
- Ensure 'Memorandums of Understanding' to inform the work practices of LTACCs and ensure an effective and pragmatic approach to working in partnership in line with NTRIS and positive duty obligations as per Section 42 of the IHREC Act (2014) for members of the LTACC
- Consultation with Travellers regarding accessibility and design of Traveller accommodation sites is essential
- Chief Executive Officer, at a minimum of once a year, to meet with the LTACC to review progress

3. Ensure Travellers are not penalized for lack of delivery in Traveller accommodation

- Local Authorities to ensure a moratorium on evictions and on the use of Housing (Miscellaneous) Provisions Act 2002-Trespass Act until the accommodation needs of all Travellers on the Housing list have been met. In the event that it is necessary for these Travellers to move to a more appropriate location until their need for accommodation is met, the local authority should work with the family to identify a satisfactory alternative location where they may remain in the interim.
- Avoid further development of temporary sites and introduce a 'toleration policy' of Travellers who have been forced to park illegally; ensure emergency facilities are provided (i.e.) water, sanitation, etc.
- Identify clear mechanisms and protocols in place in consultation with Traveller organisations to meet the emergency and temporary accommodation requirements brought on by changes in Traveller families personal circumstances (i.e.) suicide, death, illness, fire, etc.

4. Ensuring Travellers' access to safe, affordable and culturally appropriate accommodation

- Where objections to providing Traveller accommodation exists, Chief Executives should exercise discretionary powers in the development of Traveller specific accommodation in their Local Authorities.
- Local Authorities should enact transparent procedures for the allocation of accommodation and such procedures should be clearly communicated to all applicants and tenants. Whether allocated Traveller specific or standard accommodation, Traveller tenants should be informed of the rights and responsibilities of both tenants and Local Authorities
- Reinstate the caravan Loan Scheme for Travellers in TAPSs 2019-2024
- Adequate provision for homeless families should be considered under the TAPS 2019-2024
- TAPSs must provide adequate play and recreational space for Traveller children
- TAPSs must take into account fire safety measures of Traveller accommodation and include site enhancement works where necessary to protect Travellers from fire hazards in line with identified timelines

5. Develop a strong evidence-base through the collection, analysis and use of ethnic data

- In order to effectively capture accurate numbers of Travellers and Roma on the local authority waiting lists, an ethnic identifier, in line with human rights standards, must be introduced, implemented and rolled out nationally as per NTRIS
- Local Authorities to report Social Housing Assessments data to the Department of Housing, Planning, Community and Local Government in their annual TAPS reports
- Disaggregated data on the basis of ethnicity to be published on local authority websites Department of Housing, Planning, Community and Local Government's website in an accessible format

6. Mainstream Traveller employment in Local Authorities

- Local Authorities to introduce positive action measures in TAPSs to provide an opportunity to increase Traveller participation and reduce exclusion from the labour market

TAPS Checklist

Prior to finalising the next round of Traveller Accommodation Plans 2019-2024, Pavee Point recommends Local Authorities Complete the Following checklist of items.

	1. Does the plan have a monitoring and evaluation framework inclusive of impact indicators, clear budget lines and timelines?
	2. Does the plan include the provision for an annual report?
	3. Does the plan contain provisions to concretely address inadequate and substandard accommodation facilities and the impact on the health outcomes for Traveller Families?
	4. Does the plan provide for a moratorium on evictions for Traveller families living on the roadside who are on existing local authority housing lists?
	5. Has the need for improved consultation with Travellers on issues regarding accessibility and design of accommodation to facilitate older Travellers or Travellers with disabilities addressed in the plan?
	6. Has there been meaningful consultation with local Travellers and representative organisations to ensure community expectations are met in the development and implementation of plans?
	7. Does the plan consider the role that Travellers can and should play in assessing local Traveller accommodation needs?
	8. Has due consideration been given to the provision of an adequate variety of accommodation options to suit the needs of different Traveller family circumstances and to the issues contained therein?
	9. Have mechanisms been identified to ensure fair and transparent procedures in the allocation and maintenance of Traveller accommodation on the basis of need?
	10. Does the plan provide for a sensitive and professional approach to dealing with complaints of anti-social behaviour?
	11. Does the plan consider the adoption of positive action measures around employment within local authorities to help build sustainable Traveller communities?
	12. Does the plan include mechanisms for monitoring and evaluating progress on implementation including annual targets.

Appendix: Local Authorities Allocations/Drawdown on Traveller Accommodation 2018

	Local Authority	Allocation 2018€	Drawdown to date 2018€
1	Carlow Co. Co.	167,740.00	
2	Cavan Co. Co.	30,000.00	
3	Clare Co. Co.	853,250.00	13,250.00
4	Cork City Council	310,000.00	
5	Cork County Council	251,197.00	
6	Donegal Co. Co.	121,800.00	
7	Dublin City Council	1,321,558.39	54,879.69
8	DUN LAOGHAIRE RATHDOWN	673,685.78	
9	Fingal Co. Co.	851,189.00	
10	South Dublin Co. Co.	869,642.50	
11	Galway City Council	176,996.00	
12	Galway Co. Co.	1,080,100.00	36,158.41
13	Kerry Co. Co.	15,350.00	
14	Kildare Co. Co.	80,000.00	
15	Kilkenny Co. Co.	201,682.00	
16	Laois Co. Co.	30,000.00	
17	Leitrim Co. Co.	159,614.00	
18	Limerick City & Co. Co.	858,739.00	26,875.00
19	Longford Co. Co.	2,922.00	
20	Louth Co. Co.	17,039.00	3,810.00
21	Mayo Co. Co.	30,000.00	
22	Meath Co. Co.	65,000.00	
23	Monaghan Co. Co.	400,000.00	29,714.30
24	Offaly Co. Co.	49,379.00	
25	Roscommon Co. Co.	230,000.00	102,273.72
26	Sligo Co. Co.	1,046,095.00	7,656.52
27	Tipperary County Councils	25,655.00	38,866.00
28	Waterford City & Co. Co.	317,280.00	
29	Westmeath Co. Co.	150,000.00	
30	Wexford Co. Co.	498,801.00	
31	Wicklow Co. Co.	209,620.00	19,393.14
	Total	11,094,334.67	332,876.78
	RESERVE	905,665.33	

Submission 7: Exchange House

<p style="text-align: center;">Exchange House Ireland National Travellers Service Submission to Dublin City Council on the subject of the Traveller Accommodation Programme 2019-2024</p>
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This submission is informed by research conducted and reports published by both state and non-state organisations

National Perspective Planning Recommendations

Sub-national government carries the main responsibility for the physical provision and maintenance of Traveller Accommodation. However, their role and performance in this regard relies heavily on appropriate national level legislation and policy. As members of the Irish Traveller Movement, Exchange House Ireland has contributed to the development of a set of national level recommendations which it now endorses:

National Traveller Accommodation Agency.

That implementing structure established to oversee and monitor Traveller accommodation provision is the National Traveller Accommodation Consultative Committee (NTACC) and in each LA area Local Traveller Accommodation Consultative Committee (LTACCs), which comprises elected council members and Traveller interests, neither structures can apply sanction and their operation have been problematic and remain in place despite reviews which have revealed flawed practice and progress. Local Authority performance is also regulated by the statutory agency the National Oversight and Audit Committee.

Since the first Traveller Accommodation Programme (TAP) 2000, the five-year mandatory plan in each LA to provide accommodation for Travellers, there has been widespread delivery failings. Analysis of outcomes in the seventeen-year period to 2017, prove nationally there has been:

- Low targets set for developing Traveller specific accommodation, halting sites, group housing and transient sites and in some instance no targets, despite ministerial directions in the regard
- Higher targets set and over delivery of Standard Housing.
- Lack of adequate planning for population growth.
- Inaction on overcrowding and homelessness
- No delivery of Transient Accommodation to facilitate Nomadism

Amending Part 8 of the Planning Act.

the planning process for providing Traveller accommodation was highlighted as the principal reason for Local Authority under delivery in the Government's report 'Review of Funding for Traveller-Specific Accommodation and the Implementation of Traveller Accommodation Programmes (2000-2016). It found "*The requirement for public consultation can result in radically discriminatory comments and feedback from the public which can block proposals going forward. 'when Traveller accommodation is being provided, part of that involves a*

public consultation process which does not happen for other accommodation. Furthermore, representatives stated that they believe elected members are campaigning against Traveller accommodation to win elections and that some of these politicians are involved with LTACCs (Local Traveller Accommodation Consultative Committees) for opposing Traveller accommodation.”

Political opposition: Local political opposition is the major barrier to advancing Traveller specific accommodation. Elected Councillors in each Local Authority are represented on Local Traveller Accommodation Consultative Committee (LTACCs) are charged with overseeing the research and assessment of need by Local Authority officials and for developing a Traveller Accommodation Programme (TAP) every four years to meet the current and projected need of Travellers in their area.

Part 8: Governed by the TAP, Local Authority staff look to source sites for provision or use part the council’s own land bank –a time-consuming stage of the process. The Local Traveller Accommodation Consultative Committee (LTACC) and Strategic Policy Committees are frequently updated on progress. It is at the stage when specific sites are proposed that opposition mounts and lobbying of the officials takes place. Negotiations between the executive and the political system trying to find compromises often take several months or years. Preliminary designs are completed, then proposals to progress the individual projects are put out to public consultation using the Part 8 process. A report, which takes account of the public submissions, is put before council for approval. It is at this stage that many projects fail to proceed due to councillor refusal to endorse the Part 8 proposal.

What is needed?

We call for an amendment to the Planning and Development (Housing) and Residential Tenancies Act 2016 to be introduced immediately **to circumvent the Part 8 process away from the local political system and invested in an *An Bord Pleanála*.**

A Home as a Constitutional Right

Travellers are afforded a statutory right to accommodation within the Irish state via the Housing (Traveller Accommodation) Act 1998, which requires local authorities to provide culturally appropriate accommodation in all its forms including: halting sites, group housing schemes, standard houses and transient accommodation.

According to a government report from 2017 which reviewed the implementation of Traveller Accommodation Programmes, Local Authorities have under delivered over the previous 16 years providing only 68% of the units required.

In order to ensure that Local Authorities redress this under-performance as a matter of urgency, Travellers should be formally and legally be included in the broad framework of housing protection to help safeguard the community given its vulnerabilities to homelessness and disproportionate subjection to eviction and inadequate supply of culturally appropriate accommodation.

Repeal the Criminal Trespass Act (2002)

Traveller Nomadism plays a vital role in the social, economic and cultural way of life and is part of who and what Travellers are. In 2002, in advance of a general election, Section 24 of

the Housing (Miscellaneous Provisions) Act was brought into law making it a legal offence to be on private or public lands. Nomadism is also a core element of Traveller culture and ethnic identity.

Exchange House Ireland believe that statutory National Traveller programmes should include a compulsion for all local authorities to make provision for Transient sites and repeal Section 24 of the housing (Miscellaneous Provisions) Act 2002 prohibiting nomadism.

Respond to Travellers in Crisis Accommodation

The Housing (Traveller Accommodation) Act 1998, mandates all Local Authorities to deliver Traveller Accommodation Programmes to meet the accommodation needs of Travellers in their area. Another mandatory requirement was the establishment of Local Traveller Accommodation Consultative Committee in each Local Authority to advice on the provision and management of accommodation for Travellers, seen as positive step towards fully addressing and improving accommodation to the Community, locally and nationally. It was also designed for Travellers and their organisations to become directly involved in discussions with Local Authorities and elected representatives on accommodation issues. However, those structures failed to be effective stymied by a lack of political will and without sanctions or comprehensive monitoring for non-delivery by local authorities responsible.

A Government review of Traveller accommodation provision 2000-2016 found consistent local authority underachievement of targets (only 68% of units provided in that time) and 55 million Euro of allocated budgets unspent. While under delivery on mandatory targets wasn't happening many Travellers families were forced into the private rented sector (162 families in 2002 to 2,387 in 2017) rendering increasing numbers homeless and fuelling the accommodation crisis further.

- We call for Traveller-specific emergency accommodation hubs in each local authority area, in recognition of the high level of discrimination experienced by the Traveller community (22 times more likely to be discriminated by landlords in accessing private rented of emergency accommodation)
- We call for additional facilities for Traveller families sharing and in overcrowded Traveller accommodation, to be brought up to standard requirements in relation to sanitation and facilities. 4,460 Travellers are sharing in overcrowded halting sites and in standard housing.
- We call for a refurbishment programme that will prioritise some of the worst sites and group housing schemes in the country. This refurbishment Programme would bring a significant amount of families into a higher standard of living.
- We call for Traveller accommodation "out of use" in recent years to be reopened and refurbished by local authorities in consultation with the Traveller community.

- We call on Local Authority Council Managers to use their emergency powers to provide emergency accommodation to families living on roadside encampments pending permanent accommodation.

Ring-fenced Funding

As quoted in the NTRIS plan “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”. At national level the underspent in Traveller accommodation should remain in place until local authorities achieve the targets in the plan 2014-2018. The new plan 2019-2024 will meet new needs and require a separate budget.

Submission 8: Health Service Executive

Submission to Local Authorities Traveller Accommodation Plan 2019-2014 (August, 2018)

Contacts:

Concepta de Brun, Social Inclusion Specialist
Ronnie Fay, THU Coordinator

Eastern Region Traveller Health Unit

The Eastern Region Traveller Health Unit (THU) covers CHOs 6, 7 and 9 and coordinated by Pavee Point Traveller and Roma Centre. The THU work plan is implemented through regional THU initiatives; 9 local Primary Health Care for Travellers Projects (PHCPs) and a specialist health initiative (Dublin, Wicklow and Kildare). The 9 PHCPs employ Traveller Community Health Workers on a part-time basis and they undertake health advocacy in a range of health arenas (e.g.) mental health, health education; child and infant health; immunization and health alerts; addiction; diet and exercise; health and well-being; women's health; men's health; and social determinants work including accommodation and environmental health issues. The key objective of the Eastern Region THU is to enhance Traveller health status, improve the capacity of mainstream health services to respond to Traveller needs and respond to the social determinants that are at the root of Traveller health inequalities.

Introduction

The Traveller Health Unit in the Eastern Region welcomes the opportunity to make this submission to inform the drafting by the Local Authorities of the Traveller Accommodation Plans 2019-2024 in this region. We acknowledge some progress has been made in the provision of Traveller accommodation during last TAP and the work of Local Authority staff that contributed to making that possible. We would also like to acknowledge the good relations between HSE staff and the local authorities in this THU region in working collaboratively in Traveller inter-agency work over many years.

Traveller Health Units (THU) were established in each Health Board area as recommended by the Task Force on Travelling People (1995). When the HSE was later established a review was undertaken of THUs and it was recommended that they continue to operate on their original geographical area base. The THU in the Eastern Region covers all of Dublin and parts of Wicklow and Kildare. We support the operation of ten Traveller Primary Health Care Projects in this region.

The aim of the Traveller Health Units is to prioritise Traveller health at the local and regional level by:

- Monitoring the delivery of health services to Travellers and setting regional targets against which performance can be measured;
- Ensuring that Traveller health is given prominence on the agenda of the HSE;
- Ensuring coordination and liaison within the HSE, and between the HSE and other statutory and voluntary bodies, in relation to the health situation of Travellers;
- Collection of data on Travellers' health and utilisation of health services;
- Ensuring appropriate training of health service providers in terms of their understanding of and relationship with Travellers;
- Supporting the development of Traveller specific services, either directly by the HSE or, indirectly through appropriate voluntary organisations.

In this submission, we highlight four key areas which affect Travellers' health and are existing THU or Government policy which we believe needs to be taken account of in the development of the Traveller Accommodation Programme 2019-2024. Namely:

1. Delivery and accountability of TAPs
2. Impact of social determinants on health
3. Impact of dispersal policy and slow pace in development of Traveller specific accommodation
4. Environmental health concerns
5. Safety of Traveller Children

1. TAP delivery and accountability

It is important from the outset to stress the need for TAPs to align with existing policy and legislation, including positive duty obligations; the National Traveller and Roma Inclusion Strategy (2017-2021); and forthcoming National Traveller Health Action Plan (NTHAP). The NTHAP which is currently being developed, refers to (in its consultation document) the role of Local Authorities in addressing health outcomes for Travellers, particularly in relation to environmental health and fire safety.

The consultation document which is comprised of feedback from 4 regional consultations, (including representatives from Local Authorities) concedes that the current structure for Traveller accommodation (i.e.) LTACCs are not effective as they often lack meaningful Traveller representation, are poorly attended and do not have enforcement powers. Further, a consistent message from each consultation was that Local Authorities have not delivered on Traveller accommodation, despite allocated budgets and targets set out in TAPs. This is clearly reflected in the 2018 figures released from the Department of Housing Planning and Local Government (see Appendix) and the Department's recent report which found that Local Authorities have consistently failed to meet their targets every year since they were made mandatory 18 years ago. This is further compounded by a gross underspend in allocated budgets, with €55 million provided for Traveller housing remaining unspent by Local Authorities since 2000.

The NTHAP consultation document stresses the need for current TAPs to ensure that budgets are spent and that accountability for delivering Traveller accommodation is prioritised through a strong monitoring and evaluation framework.

Recommendations:

- Traveller organisations to nominate representatives to LTACCs; where Traveller organisations do not exist, NTACC to support nominations.
- Development of the TAP to be underpinned by a robust monitoring and evaluation framework inclusive of annual targets and budgets.
- Local Authorities to develop an annual progress TAP reports to monitor progress; reports to be submitted to the Department of Housing Planning Community and Local Government.
- Chief Executive Officers to present annual TAP reports to the Joint Committee on Housing, planning and Local Government.

2. Social Determinants of Health

Our submission, in keeping with government policy, reflects a social determinants approach to health which recognises that some of the key determinants of health exist outside of the health care sector. This approach recognises that issues such as living conditions, educational attainment, employment status, racism, discrimination and poverty all impact on health as reflected in the National Health Strategy and the Healthy Ireland Strategy a Framework for Improved Health and Well Being 2013-2025. The vision of this Healthy Ireland Strategy is that *'we will have an Ireland where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility.'*

The goals of this Healthy Ireland Strategy are to:

1. Increase the proportion of people who are healthy at all stages of life
2. Reduce health inequalities
3. Protect the public from threats to health and wellbeing
4. Create an environment where every individual and sector of society can play their part in achieving a healthy Ireland

Healthy Ireland promotes a whole government approach to health and recognizes that health is the responsibility of all sectors in society and that health outcomes are affected by much that is beyond the control of health services. The strategy therefore promotes partnership and cross-sectorial working including greater collaboration between health services and Local Authorities. It acknowledges health inequalities and the impact of broader social determinants on health status; these determinants include accommodation provision and the impact that poor facilities can have on both physical and mental health.

The All Ireland Traveller Health Study (AITHS) (2010) documented Travellers continue to have high mortality rates and low life expectancy. The study found that the life expectancies of the Traveller community today are comparable to life expectancies of the general population in the late 1940s for males and early 1960s for females. Some of the key findings in relation to mortality rates and life expectancy are as follows:

- Life expectancy at birth for male Travellers has remained at the 1987 level which is 15.1 years less than men in the general population
- Life expectancy for females is 11.5 years less than women in the general population.
- Traveller men have 3.7 times the mortality of males in the general population and for Traveller females the mortality is 3.1 times higher.
- Traveller infant mortality is estimated at 3.6 times higher than in the general population.
- Traveller suicide rate is 6 times higher than in the general population.

The AITHS also documented that the majority of Traveller families are now living in standard accommodation (73%) with 18% living in trailers. However, the study indicated that access to a range of public services amenities was poor. Travellers are a very young population with 63% of Travellers under 25 years and a mere 3% over 65 years, the equivalent rate for the general population was 13.3%. The Traveller family is comprised of a married couple with children had an average of 5.3 persons per household compared with 4.1 for the general population. The most recent Census found that the majority of Travellers are living in standard accommodation, primarily by renting from a Local Authority (65.5%). This is met with a sizable decline in Traveller households renting from a private landlord in 2016, a 19% decrease from since 2011.

However, we note Census 2016 reports the number of caravans or other mobile or temporary structures increased by 10.3% between 2011 and 2016 after falling substantially between 2006 and

2011. This is in the context of overcrowding; with Traveller overcrowding seven times the national rate, this includes the increasing numbers of Travellers living in temporary accommodation; y almost 5% between 2011 and 2016; accounting for 12.2% of all Travellers.

Recommendations:

- Traveller specific accommodation should be developed and the needs of nomadic Travellers catered for as recommended in the Housing (Traveller Accommodation) Act 1998.
- Traveller organisations should be directly involved in the accommodation needs assessments which could be informed by their experience in conducting the AITHS.
- Projected growth in the Traveller population needs to be planned for and the changing demographic profile of the Traveller community should be taken into account by Local Authorities. This exercise should be undertaken in partnership with Traveller organisations.
- Needs of older Travellers, Travellers with a disability and Traveller children need to be specifically taken into account in developing the TAP
- Local Authority staff should be trained in Traveller cultural competence in order to comply with positive duty obligations.

3. Impact of dispersal & private rented accommodation policy

The AITHS documented that the concept of Travellers as a community is integral to an understanding of their health status. Travellers self-identify, share a culture and value systems, choose to socialise and congregate together and value immediate and extended family networks. Such ‘social capital’ is found to be good for your health.

Increasingly Local Authorities are accommodating Traveller families in the private rented sector- either in houses or apartments, with little Traveller specific accommodation provision being built. Lack of security of tenure is another emerging issue for Travellers with an ever-increasing number of Traveller families being accommodated through the private rented sector and the use of Housing Assistance Payment (HAP) and Rental Accommodation Scheme (RAS) scheme. Traveller families accommodated in this way remain invisible as Local Authority Social Housing Support/Assessment forms collect information on requests for Traveller specific accommodation, a request that in reality is unlikely to be met by Local Authorities in the immediate future. Ethnicity is not included as an administrative category (i.e.) similar to nationality, marital details, etc. In the absence of data, Local Authorities are unable to strategically plan for the provision of Traveller accommodation. Other statutory bodies and agencies under their remit, including the Pathway Accommodation & Support System (PASS), have implemented and rolled out an ethnic question (‘ethnic identifier’) in routine administrative datasets. It is in this context that Local Authorities should follow suit.

Where Traveller families are being accommodated in the private rental sector, particularly in rural areas, Traveller families are frequently being allocated accommodation in different towns posing difficulties in access to extended family members. These practices can contribute to a growing isolation among Traveller families and difficulties in accessing support from wider family members in child-rearing, baby-sitting, homework support, helping sick relatives, protecting women experiencing violence etc. They can also isolate Traveller families leaving them vulnerable to attack at times of community conflict. It can also expose children to discrimination from ‘settled’ neighbours at an early age. As indicated in Census 2016 Traveller families are being squeezed out of the private rental market and are being placed in vulnerable situations, including homelessness. Travellers represent 9% of the homeless population despite only making up 0.1% of the national population. Traveller families, like all families, find this situation very stressful and it is having a negative impact on their health.

There is now a growing recognition in society that mental health wellbeing is contingent on physical and social wellbeing. Perceived discrimination was a major problem for all Travellers documented in the AITHS. This, along with the evidence of a suicide rate six times the national average (and seven times for Traveller men), as well as the high numbers of Travellers who said their mental health was not good and that they experienced depression, indicates some of the accommodation policies contribute negatively on Traveller health.

- Recommendations:**
- Traveller specific accommodation should be provided for in the TAP
 - Extended Traveller family networks should be prioritised and taken account of in the allocation of Traveller accommodation
 - An ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS

4. Environmental concerns

The National Traveller Health Strategy (2002) recognised that *‘the living conditions of Travellers are probably the single greatest influence on health status. Stress, infectious disease including repertory disease and accidents are all closely related to the Traveller living environment. It is clear that an immediate improvement to the living environment of Travellers is a prerequisite to the general improvement in health status’* (p.28)

Many Travellers continue to live in very poor accommodation conditions and an unsafe physical environment. There is often a high level of overcrowding; damp problems; pest infestation and lack of basic facilities such as sewerage, public transport, paved roads, pedestrian pavements and electric lighting. Illegal dumping and intermittent rubbish collection are problems highlighted by Travellers. Poor site design and drainage problems as well as environmental hazards from land adjoining Traveller accommodation are concerns for Traveller residents. The AITHS documented that few Travellers own their homes (less than 13% compared to 70% of other medical card holders). Some Travellers live under a constant threat of eviction. A quarter of families considered where they live to be unhealthy or very unhealthy and 26.4% considered their place of residence unsafe.

Living on isolated sites, beyond walking distance from services, it may be impossible to travel to health appointments during the day. For those families without an authorised place to stay, finding a stopping place with sanitation and water may often prove more of a priority than dealing with preventative medical issues. Enforced mobility, through evictions or lack of available stopping places, greatly reduces opportunities to attend appointments, follow up previous care and access a range of preventative health care.

- Recommendations:**
- A framework for improving environmental health in Traveller accommodation should be developed and incorporated into the TAP
 - 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

5. Traveller Children

Traveller families are larger than those in the general population yet Travellers have fewer rooms in their homes than their settled counterparts (AITHS & Census 2016) which results in Traveller children often living in overcrowded conditions. Despite having bigger families, the AITHS documented that 77.5% of Traveller children had no safe play areas on their sites or group housing schemes. Absence of play facilities often posed a risk to Traveller children’s safety. Action 61 in the National Traveller and Roma Inclusion Strategy (NTRIS) obliges Local Authorities, to ensure the need for access to safe, appropriate play areas when designing Traveller specific accommodation. Further, a risk of equal

concern is the proximity of many Traveller sites to dual carriageways and the absence of pedestrian lighting; lack of public footpaths or lighting placing young Travellers in danger when walking to school, shops or recreation facilities.

Living in poor quality accommodation and overcrowding can result in health difficulties for children. Research has shown that overcrowding can lead to an increase in infectious disease among children particularly gastro-enteritis, skin disorders and chest infections. There are also concerns that children’s development can be hindered by living in cramped conditions and poor accommodation. It can also result in poor physical health including an increase in the incidence of asthma among children. The AITHS documented a child asthma rate of 70% in children reporting a current health problem. It also reported a higher prevalence of hearing, eyesight and speech problems among Traveller children compared to the general population – this is in keeping with international evidence.

The UN Convention on the Rights of the Child protects the cultural rights of children belonging to indigenous and minority groups, including Traveller children. The lack of provision of Traveller specific accommodation and the implementation of the Miscellaneous Provisions Act undermines the rights of Traveller children in exercising their culture and having the opportunity to continue some of their traditions including the right to be nomadic. Dispersing Traveller families throughout Local Authority areas and isolating Traveller children in private rented houses and apartments is undermining of Traveller culture and having negative health impacts manifested in mental health problems, drug addiction and breakdown of families. Poor accommodation is also affecting Traveller children’s participation in and outcomes from the education system. In 2016 in its’ concluding observations on Ireland the UN Committee on the Rights of the Child recommended that the State “Ensure that sites in which Traveller and Roma households reside are equipped with adequate water and sanitation facilities as well as safe and appropriate recreation facilities for children”; and the State should “increase the amount of funding allocated for housing facilities that address the needs of Traveller and Roma children and their families; and, provide mechanisms and procedures that ensure the effective and timely use of such funding.

Recommendations:

- Play facilities should be provided in Traveller specific accommodation in line with Action 61 in NTRIS
- The cultural rights of Traveller children should be taken into account in the planning and provision of Traveller accommodation.
- Child well-being indicators need to be factored into the TAP
- Traveller specific accommodation should be assessed in terms of its impact on children’s well-being and the findings addressed in accommodation up-grading; maintenance or development

Appendix: Local Authorities Allocations/Drawdown on Traveller Accommodation 2018

	Local Authority	Allocation 2018€	Drawdown to date 2018€
1	Carlow Co. Co.	167,740.00	
2	Cavan Co. Co.	30,000.00	
3	Clare Co. Co.	853,250.00	13,250.00
4	Cork City Council	310,000.00	
5	Cork County Council	251,197.00	
6	Donegal Co. Co.	121,800.00	
7	Dublin City Council	1,321,558.39	54,879.69
8	DUN LAOGHAIRE RATHDOWN	673,685.78	
9	Fingal Co. Co.	851,189.00	
10	South Dublin Co. Co.	869,642.50	
11	Galway City Council	176,996.00	
12	Galway Co. Co.	1,080,100.00	36,158.41
13	Kerry Co. Co.	15,350.00	
14	Kildare Co. Co.	80,000.00	
15	Kilkenny Co. Co.	201,682.00	
16	Laois Co. Co.	30,000.00	
17	Leitrim Co. Co.	159,614.00	
18	Limerick City & Co. Co.	858,739.00	26,875.00
19	Longford Co. Co.	2,922.00	
20	Louth Co. Co.	17,039.00	3,810.00
21	Mayo Co. Co.	30,000.00	
22	Meath Co. Co.	65,000.00	
23	Monaghan Co. Co.	400,000.00	29,714.30
24	Offaly Co. Co.	49,379.00	
25	Roscommon Co. Co.	230,000.00	102,273.72
26	Sligo Co. Co.	1,046,095.00	7,656.52
27	Tipperary County Councils	25,655.00	38,866.00
28	Waterford City & Co. Co.	317,280.00	
29	Westmeath Co. Co.	150,000.00	
30	Wexford Co. Co.	498,801.00	
31	Wicklow Co. Co.	209,620.00	19,393.14
	Total	11,094,334.67	332,876.78
	RESERVE	905,665.33	

Submission 9: Ballyfermot Travellers Action Project



Submission to Dublin City Council from Ballyfermot Travellers Action Group on the proposed Traveller Accommodation Plan for the period 2019-2024

Ballyfermot Travellers Action Project, welcomes the opportunity to make a submission responding to DCC’s DRAFT Traveller Accommodation Programmes (TAP) 2019-2024

As a community development organisation BTAP coordinate and implement a range of initiatives in response to identified community need. BTAP continues to be the first point of contact for Travellers in Ballyfermot when seeking support on a range of issues affecting their lives. A core area of our work is in relation to Traveller Accommodation and over the past 3 years this has been a priority focus BTAP is committed to supporting the residents of Labre Park in expressing their concerns and in seeking an ongoing and transparent consultation process with Dublin City Council on the implementation of this proposed TAP.

BTAP endorses the belief of Traveller’s right in their involvement and engagement in determining and responding to Traveller accommodation needs. This includes the support of Traveller engagement with key structures and policy arenas including the Local Traveller Accommodation Committee (LTACC). The Department of Housing Planning Local Government. (DHPLG) and the National Traveller Accommodation Consultative Committee (NTACC) recognise the role of local Traveller representative organisations as key players in supporting the new TAP.

The meaningful participation and inclusion of the Traveller community within all decision making structures is a core value held and supported by BTAP.

Assessment of Need.

Labre Park residents and BTAP appreciated the process of consultation undertaken for the last Traveller Accommodation Programme and regret that this process was not used to assess the change in current need prior to the DRAFT development of this TAP. This coupled with the lack of regular LTACC meetings has led to a concern re the commitment to consultation and participation and some unease as to the fear of tokenism. However, BTAP welcomes the statement in the DRAFT TAP.... *Dublin City Council is committed to the provision of high quality Traveller Accommodation in accordance with the aspirations and desires of the majority of Traveller Families identified in the Assessment of Need 2018 and its stated commitment to engagement with local Traveller Groups... Dublin City Council will continue to engage on all Traveller Issues through the Local Traveller Accommodation Consultative Committee, Inter Agency Groups, National Organisations, Traveller Representative Groups and Traveller Resident Associations*

BTAP notes the statement in relation to the standard housing... *Dublin City Council has noted the increased interest of the Traveller Community in accessing standard housing. The Traveller Accommodation Unit shall endeavour to increase the number of standard housing allocations to Travellers in cooperation with Local Area Offices.* A Government review of Traveller accommodation provision 2000-2016 found consistent local authority underachievement of targets (only 68 % of units provided in that time) and 55 million Euro of allocated budgets unspent. The lack of delivery on

mandatory targets wasn't happening so many Traveller families were forced into the private rented sector (162 families in 2002 to 2,387 in 2017).

BTAP believe some families accepted standard social housing as a temporary option while awaiting permanent Traveller specific accommodation. Indeed, some families accepted this as the time span grew for the re-development of Labre Park and other areas and they feared it would not happen as their children grew up in substandard accommodation.

BTAP will work in collaboration with DCC to ensure the inclusion of Travellers families living in standard social housing and private rented accommodation within the assessment of need.

Allocation of Housing

BTAP reiterate the call they made in the last TAP for local authorities to adopt and implement a scheme of letting priorities based on a points system for allocating accommodation to applicants on waiting lists. A points system will bring openness and transparency to the allocation process.

Housing authorities must not operate separate waiting lists for Traveller applicants to standard housing. The use of dual lists gives rise to concerns of quota systems and ignores the real need that exists for many Traveller families. The Housing (Traveller Accommodation) Act, 1998, mandates all Local Authorities 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.

As recommended in the 4th TAP, the 5th 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.

As part of a scheme of letting priorities to Traveller specific accommodation including Groups Housing and Halting Sites, compatibility with existing tenants of such accommodation should be considered as one of the criteria of the scheme. Furthermore, BTAP recommends that management issues with existing Traveller specific accommodation should not be a reason to delay or postpone the development of new accommodation.

Nomadism

Section 24 of the Housing (Miscellaneous Provisions) Act was brought into law making it a legal offense to be on private or public lands. The then Minister reassured that this legislation would not apply to Traveller families camped on the roadsides. In actuality, when legislation was passed, implementation was swift by some local authorities and many Traveller families were evicted from public lands and their homes confiscated, rendering them homeless and facing prosecution. Today, less than 1 in 10 families travel often citing the lack of transient sites (less than 50 in Ireland) and the fear of *getting into trouble with the Law for pulling into the side of the road*

BTAP have consistently maintained that the provision of transient accommodation needs to be an integral element of DCC's Traveller Accommodation programme. Travellers consulted in Ballyfermot indicated that they would like to see the provision of transient sites across Ireland.

BTAP also submit that the provision of transient sites must not be used as 'temporary' accommodation provision for those who are waiting on permanent accommodation.

LABRE PARK

BTAP work with Travellers from the wider Ballyfermot area living in standard housing, private rented accommodation, however, it has always been stated and agreed that the main focus of BTAP's work is with the residents of Labre Park.

A redevelopment plan for Labre Park has been a key emphasis of the work of BTAP over the last TAP (and for the last 10 years.) The work to redevelop Labre Park in a culturally appropriate way with the full consultation of the residents in every area of the development was a crucial aspect of that work.

BTAP supported the residents to work with CLUID & DCC and in June of 2018, the residents signed off on a plan that addressed all of the needs of the community. It was a tremendous effort on all sides and something Labre Park residents were truly proud of.

It was disappointing for BTAP and the residents to see that the pre Part 8 plan submitted to the City Council last OCT had changes to it that had not been discussed or agreed with the residents. In the past while the process was often fraught with tensions, an agreement was always reached to the mutual satisfaction of all sides with compromise on all sides also.

BTAP and residents look forward to addressing these changes with CLUID & DCC and seeing the final plan (supported by residents) being fully endorsed by the City Council at the earliest opportunity. Until this plan is realised Labre Park continues to be a very difficult environment to live in. It is bordered by an industrial estate, there are no safe play or green areas and no community facility. The living conditions are harsh and for some families, overcrowding adds to an already intolerable situation.

Local Traveller Accommodation Consultative Committee (LTACC)

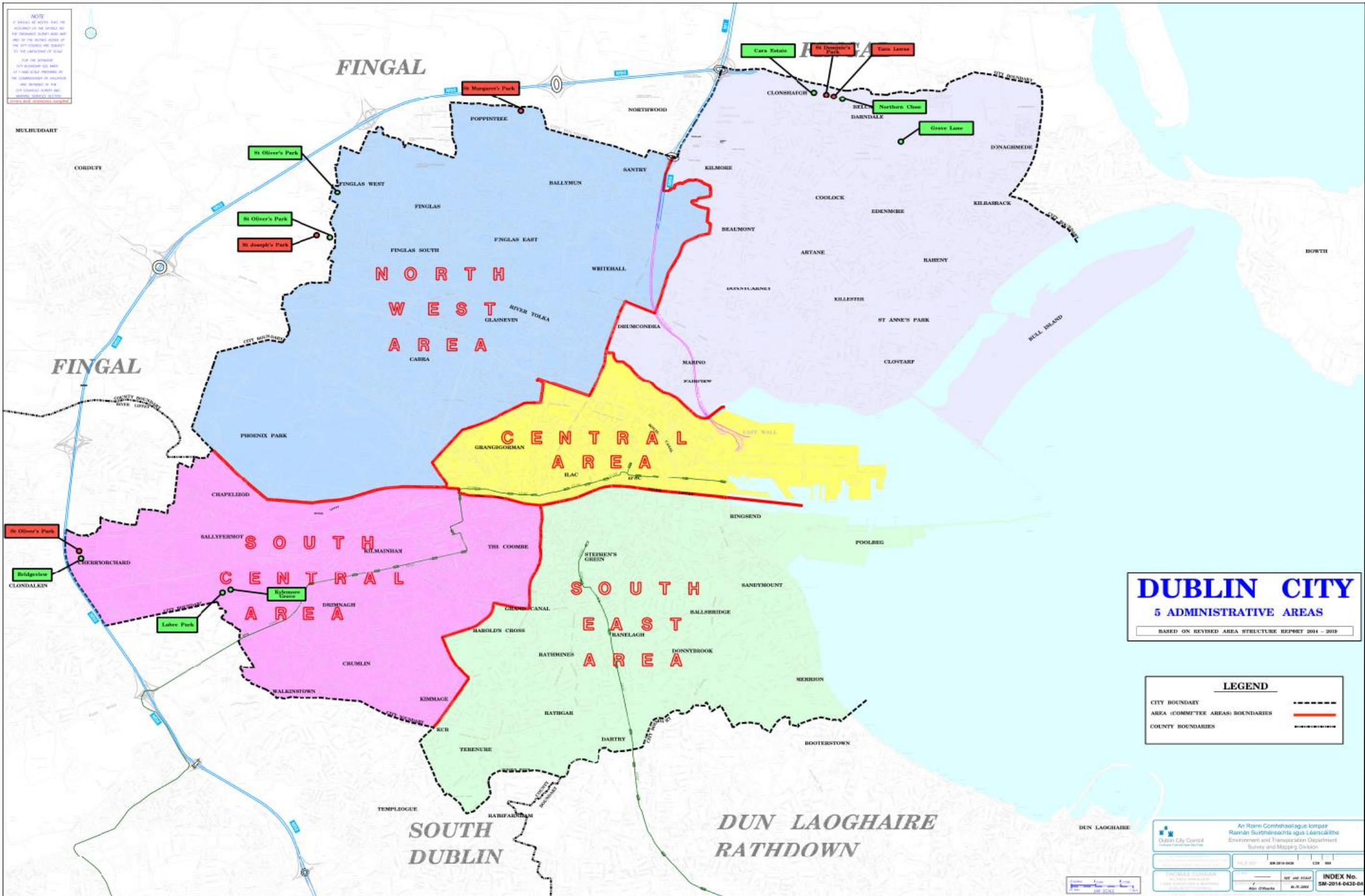
BTAP have always seen the role of the LTACC as a core mechanism for continued engagement and monitoring by Traveller reps, local Traveller organisations, Councillors and the Council on the agreed delivery outputs of the TAP. However, the experience of this has not always lived up to expectations. It was extremely saddened by the lack of regular meetings since April 2018. BTAP looks forward to resumption of regular meetings in 2019 and an agreement to implement fully the recommendations made by the review process as stated in DRAFT TAP 2019-2024. We regret that we were not part of this review and believe this omission to be contrary to the existing guidelines.

We also look forward to the release of the report from the Expert Working Group on Traveller accommodation and seek to address their expected recommendations in relation to Traveller Accommodation through the LTACC process.

We ask that the LTACC:

- meet a minimum of 6 times a year.
- Establish sub groups when required and agree Terms of Reference.
- Nomination procedures be inclusive and transparent. Where local Traveller groups exist, they nominate and elect their own reps.
- Is not a forum for individual cases.
- assist in ensuring the full implementation the TAP, through clear and agreed mechanisms reviewed on a quarterly basis.

In conclusion BTAP are clear in their commitment to the provision of culturally appropriate accommodation as identified by Travellers and welcome DCC's commitment to work with CENA in this area. We ask that DCC take on board the recommendations in this submission based on the DRAFT TAP for 2019-2024



Map of Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites

