



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Dublin City Council's Traveller Accommodation Programme 2025-2029

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Introduction

The Housing (Traveller Accommodation) Act, 1998 requires Dublin City Council to prepare and adopt a 5-year Traveller Accommodation Programme to meet the existing and projected accommodation needs of members of the Traveller Community within its administrative area.

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

In accordance with Section 10 of the 1998 Act, the Minister has advised that the existing Traveller Accommodation Programmes are to continue to operate to the end of 2024. The Sixth Traveller Accommodation Programme is to be adopted by the 31st December 2024 for a period of 5-years from 1st January 2025 to the 31st December 2029. To put this into context an overview is given of the existing accommodation and the previous Traveller Accommodation Programme 2019-2024.

This Programme details the actions Dublin City Council will implement to meet the current and future accommodation needs of Traveller families within the county over the course of the next 5-years.

What is a Traveller Accommodation Programme

This Traveller Accommodation Programme (TAP) is a five year programme which outlines how Dublin City Council intends to meet the current and predicted accommodation needs of the traveller population during the lifetime of the plan.

The adoption and implementation of Traveller Accommodation Programmes is a statutory function of Local Authorities and the process and timelines for the adoption of the programme are set out via Ministerial guidelines issued by the Department of Housing, Local Government and Heritage. The adoption of the programme is a reserved function, i.e. it is a policy decision made by the Dublin City Council Councillors (elected members).

The process that local authorities undertake includes:

Assess and estimate of the current and future accommodation needs of the traveller community, by carrying out a yearly survey and consultation with key stakeholders such as the DCC Local Traveller Accommodation Consultative Committee, traveller representative groups, Dublin Local Authorities, statutory and non-statutory bodies.

Policy Statement

Dublin City Council's Traveller Accommodation Unit is committed to the delivery of high quality Traveller accommodation. We are committed to meeting the housing needs of the families identified through our recent assessment of needs.

Dublin City Council intends to address the identified need through a construction and refurbishment programme (subject to funding), which includes the refurbishment and extension of existing sites, Part V developments, standard housing, acquisitions of Traveller specific homes and the development of new sites where suitable land is available.

The Council will continue to consult and liaise with all relevant stakeholders to assist with the implementation of this programme, including the families in need of housing, the Local Traveller Accommodation Consultative Committee (LTACC), Inter Agency Groups, National Organisations, Traveller Resident Associations, other Local Advocacy Groups and adjoining Local Authorities.

Dublin City Council will continue to provide a comprehensive range of on and off-site services to the Traveller Community. Such services include, access to the Social Worker support services, Estate Management, maintenance and repair services, cleansing and mobile Caretaker services. We will also be introducing a new Waste Management Service in 2025 across all of sites which will provide a weekly collection service which will significantly reduce waste and illegal dumping on our sites.

Unauthorised encampments, unauthorised occupiers and anti-social behaviour will be dealt with in accordance with the Council's current Estate Management Strategy Fostering Safer Neighbourhoods 2022-2027 and the appropriate legislation.

The delivery of Permanent Halting Sites will be in accordance with Departmental guidelines and will be dependent on land availability. Through discussions with the Traveller Community and Local Representative Groups, it has been requested that any future Halting Sites should be constructed on a smaller scale to allow for smaller family groupings. It is felt that this would assist in better Estate Management and help reduce incidents of anti-social behaviour.

Dublin City Council has also noted an increased interest from the Traveller Community in obtaining standard housing. The Traveller Accommodation Unit are working with families who have expressed an interest in moving to standard housing and the team is working with our Allocations unit to increase the number of standard housing allocations offered to Traveller families. We have also sought to increase the number of acquisitions for Traveller Specific Accommodation. To date, we have had 11 successful purchases with 4 now fully allocated and 6 currently under refurbishment and pending allocation.

The concept of providing transient sites which would allow members of the Traveller Community to live a traditional nomadic lifestyle has been discussed at meetings with our LTACC and Local Representative Groups. This type of site is intended to allow members of Traveller Community who reside outside of the City's boundary, to use facilities on site for short stays as they move around the country. We have also consulted with other Dublin Local Authorities who have confirmed that there was no consensus amongst Travellers for transient sites in their areas. Therefore, it is proposed the four Dublin Local Authorities will continue to work on a regional

response to the provision of transient sites. Consideration will not be given to their provision in the Dublin regional area unless there is a consensus amongst Travellers in the region for these sites, coupled with the development of a national policy on their location, management and control.

Dublin City Council are committed to meeting our statutory obligation under the Equal Status Acts 2000-2018 and the Public Sector Duty contained in the Irish Human Rights and Equality Commission Act 2014. We will continue to promote human rights and equality in the delivery of our services.

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

Strategy Statement

Dublin City Council will be adopting a five tier approach to the delivery of Traveller Accommodation units of the lifetime of the Programme as follows:

- Refurbishment and extension of existing sites;
- Refurbishment and re-let of existing Traveller specific housing;
- Construction of new units and development of new sites;
- Standard Housing; and
- Acquisitions.

The Council's Traveller Accommodation Unit will take the lead with responsibility for the delivery of this programme by working closely with DCC Quantity Surveyors, City Architects, Housing Construction and Development and all relevant internal and external bodies who play a key role in the delivery of new and refurbished units. It should be noted that all construction and refurbishment of projects are subject to funding from the Department of Housing, Local Government and Heritage and are subject to planning permissions in accordance with Part 8 of the Planning and Development Act 2000, Regulations 2001 and Section 179a of the Planning and Development Regulations 2023.

TAU will continue to consult with our Local Traveller Accommodation Consultative Committee (LTACC), and relevant statutory and non-statutory bodies in the traveller community. TAU are committed to building on the strong relationships that currently exist with relevant traveller representative groups and the traveller community to deliver this programme via a consultative approach, regular meetings, issuing of reports and attendance at meetings and participation in inter-agency committees.

TAU will issue regular updates on the progress of this programme via reports and at LTACC meetings and Housing SPC.

Review of the Traveller Accommodation Programme 2019-2024

Existing Traveller Accommodation

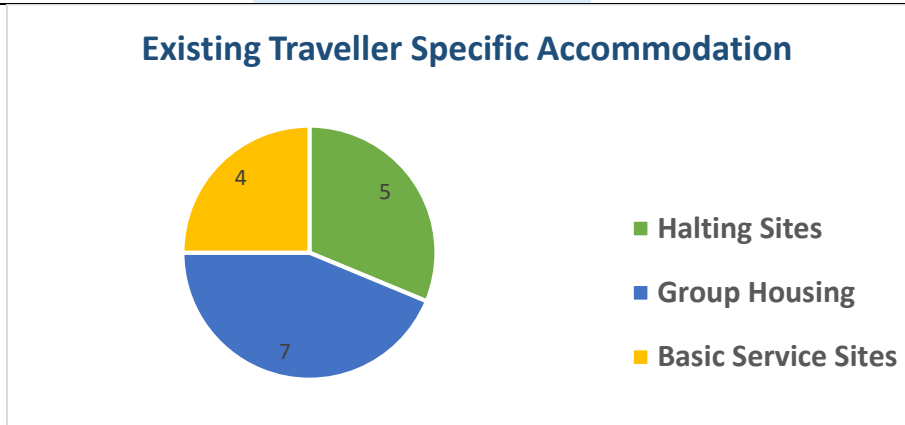
In 2018 the Annual Traveller Count took place on the 30th November 2018, and identified 802 families residing within the City’s boundary.

The last Annual Traveller Count took place on 24th November 2023, and identified 854 families residing within the City’s boundary which is an increase of 6.4% on the 2018 figures.

The tables and graphs below give a breakdown of the type and number of current DCC traveller specific accommodation, number of units/bays per site and number of families sharing. A comparison between 2018 (TAP 2019-2024) and November 2023 (date of last count of the traveller community in the DCC Administrative area) of traveller families in all types of accommodation is also provided. This table indicates an increase of 50 families from 2018 to 2023.

It should be noted the information provided is based on data available to the TAU as of June 2024.

Existing Traveller Specific Accommodation	
Type of Accommodation	No. of Bays / Houses
Halting Sites	5
Group Housing	7
Basic Service Sites	4



Breakdown of Existing Traveller Specific Accommodation

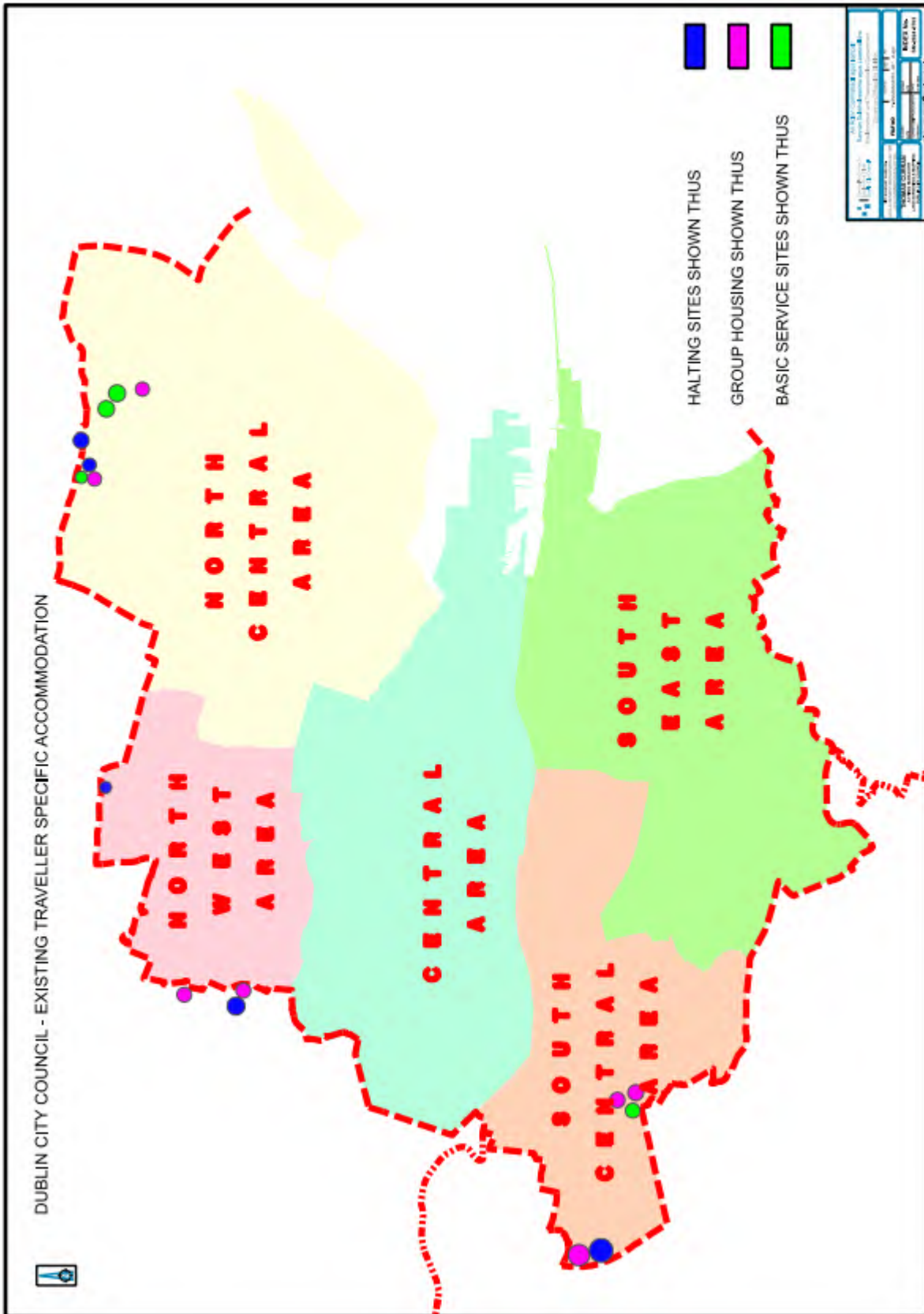
Existing Traveller Specific Accommodation	
Type of Accommodation	No. of Bays / Houses per site
Halting Sites	5
Group Housing	7
Basic Service Sites	4
Total no. of sites	16

Breakdown of Existing Traveller Specific Accommodation		
Halting sites	Bays	Sharing
St Margaret's Park	30	2
St Joseph's Park	14	2
St Oliver's Park	14	0
St Dominic's Park	23	3
Tara Lawns	11	1
Total	92	8
Group Housing	Houses	Sharing
St Mary's Park, Finglas	10	3
Avila Park, Finglas	50	22
Cara Park, Coolock	41	28
Grove Lane,	1	3
Labre Park, Ballyfermot	14	1
Kylemore Grove, Ballyfermot	8	0
Bridgeview	11	0
Total	135	57
Basic Service Sites	Bays	Sharing
Wards Field, Belcamp Lane	13	2
Area A Belcamp Lane	17	5
Cara Park	9	3
Labre Park	11	0
Total	50	10

Annual Estimate of Traveller Families & Their Accommodation Position 2018 & 2023

Accommodation Types	No. of Families 2018	No. of Families 2023
Standard housing (including those sharing)	335	407
Group housing Schemes (including those sharing)	202	202
Traveller Halting Site (including those sharing)	63	167
Voluntary Housing Associations (AHB)	17	59
Unauthorised Sites	116	3
Private Rented (including those sharing)	69	10
Traveller Specific Acquisitions	0	4
Private Ownership	2	2
Total	804	854

It was identified during the Annual Traveller Count (November 2023) that 407 families were residing in standard housing, four families were residing in housing purchased by Dublin City Council as Traveller Specific Housing, 10 families were residing in private rented accommodation via HAP and two families resided in private ownership.



Projects Delivered – Traveller Accommodation Programme 2019-2024

The Traveller Accommodation Programme 2019-2024 identified actions to provide accommodation for the predicted increase in the traveller community and improve existing traveller accommodation. Table below identifies the projects delivered during the life-cycle of the programme.

Traveller Specific Accommodation Delivered 2019-2024	
St Dominic's Park	23 - Bays resurfaced with full electrical upgrade and Sanitation Units installed
Tara Lawns	11 - Bays resurfaced with full electrical upgrade and Sanitation Units installed
Wards Field	Reclassified as a Basic Service Site (previously an unauthorised site) following the installation/supply of electrical and sanitation units and extension of site completed
Area A Belcamp	Reclassified as a Basic Service Site (previously an unauthorised site) following the installation/supply of electrical and sanitation units and extension of site completed
Kylemore Grove	3 - Houses fully refurbished
Avila Park	Full refurbishment of 1 house completed to allow for re-allocation and 1 medical extension completed
Bridgeview	1 house fully refurbished to allow for re-allocation
Labre Park	Full electrical sanitation services upgrade and resurfacing of Bays
Labre Park	Playground installed Q4 2024
Caravan Schemes	Funding for 18 caravans in 2022 under the Dept. Caravan Loan Scheme Funding for 15 caravans in 2022 under the Dept. Emergency Caravan Scheme Funding for 10 caravans in 2023 & 2024 under the Dept. Caravan Loan Scheme Funding for 10 caravans in 2023 under the Dept. Emergency Caravan Scheme Funding for 8 caravans in 2024 under the Dept. Emergency Caravan Scheme
Acquisitions	11 Traveller Specific Acquisitions from 2022 to 2024

Overview of Traveller Accommodation Programme 2019-2024

Standard Housing Accommodation Lettings 2019 to Q1 2024

The table below outlines the number of traveller families' allocated DCC houses via the Council's Housing Waiting List. The 2019-2024 programme proposed a need for 56 standard housing allocations and this was exceeded by 22 standard lettings.

Year	No. of Houses
2019	19
2020	11
2021	15
2022	8
2023	21
2024 Q1 & Q2	14
Total 2019-Q2 2024	88

**Standard housing – Local Authority owned housing that is rented to tenants*

During the period 2022-2024 DCC purchased 11 houses from the open market which are classed as traveller specific housing through funding received from the Department of Housing, Heritage and Local Government. These units will remain as traveller specific DCC housing stock.

**Traveller Specific Housing Acquisitions	
Year	No. of Houses
2022	2
2023	3
2024	6
2022-2024	11

*** Housing that is purchased from the open market and is DCC standard housing assigned as traveller specific accommodation*

No. of dwellings traveller specific open market

Waste Management Programme 2019-2024

A sum of €1.2million was spent for the removal of illegally dumped waste across all 14 sites over the course of the 2019 – 2024 TAP. The Traveller Accommodation Unit's Waste Management Programme is designed to reduce issues with illegal dumping and waste removal across all of our sites. Each unit has received an 1100ltr bin which is collected on a weekly basis. The 2019-2024 TAP identified the requirement for recycling services; unfortunately this was not achieved however it is incorporated into the 2025-2029 Programme and will be delivered as part of the Waste Management Framework. A review the TAU waste management including size and types of bins may also be incorporated into a DCC TAU Waste Management Framework.

Pilot Energy Retrofit Programme

A successful Pilot Energy Retrofit Programme was completed in Cara Park and consequently will be extended to all group housing schemes. Of the 41 houses on Cara Park, residents of 28 agreed to the retro-fit programme. The remaining 13 set of residents will be offered the Energy Retrofit under the 2025-2029 Programme.



Caravan Loan Scheme – Pilot Project 2022-2024

Under the Dept. Housing Local Government and Heritage the Caravan Loan Pilot Project provided for the purchase of caravans. In the Dublin City Council Administrative Area the following number of caravans were provided

In 2022 funding was granted for 18 caravans. In addition to this 15 caravans met the criteria under the emergency caravan loan scheme.

Funding was granted for a total of eight caravans which were delivered in 2023. DCC TAU secured funding for an additional two caravans which were delivered in early 2024. In addition to this 10 caravans met the criteria under the Dept. Emergency Caravan Scheme with a further eight caravans meeting the criteria in Q4 2024.

In Q4 2024 Department of Housing, Local Government & Heritage provided the following update: the Department completed a review of the nationwide Pilot Caravan Loan Scheme which operated across 2023/2024. Options for a national scheme are currently under consideration with the intention that a national scheme will be brought forward in 2025.



Overview of Traveller Accommodation Programme 2019-2024

An independent review of Dublin City Council's existing Traveller Accommodation Programme was carried out in 2022 and an updated review was completed early in 2024. It was noted in this review that the delivery of new Traveller specific housing was extremely slow however, the impact of the Covid-19 Pandemic was noted as the main cause along with on-going conflict with residents on some sites in the administrative area.

Recommendations were made particularly in relation to the overall resourcing of the Traveller Accommodation Unit in order to improve productivity and service delivery. Significant changes have been made with regards to resourcing the Accommodation Unit which has resulted in a noted improvement in service delivery. However, there are on-going cases of threatening behaviour and intimidation tactics being used by residents towards the Local Authority staff and contractors. While these cases are a minority, it can unfortunately lead to significant delays with progressing both maintenance works and redevelopment plans on sites as workers are too afraid to attend site.

These issues have been raised with our Local Traveller Accommodation Consultative Committee (LTACC) and it has been requested that a discussion take place at a national level in order to help put together a more progressive strategy to deal with these situations as and when they occur.

The Review recommended that both the Traveller Community and the Local Authority take a more collaborative and respectful approach to allow for safe and constant delivery of good quality Traveller Specific Accommodation.

It was noted that all staff within the Traveller Accommodation Unit had received Anti-Racism and Cultural Awareness Training. This training was delivered by Pavee Point and was acknowledged in the review as a positive step in further educating staff with regards to the on-going issues facing the Traveller community. In 2023 TAU staff also took part in Jam Card Training (Jam stands for Just A Minute and allows people with a hidden disability or communication barrier to let others know that they need extra time in a simple and discreet non-verbal manner).

The significant spend on improvement/remedial works, connection works for electricity and water on previously unauthorised sites (now referred to as Basic Service sites), which were carried out throughout the Pandemic, was acknowledged in the Review. During the period 2021 to 2023 inclusive DCC Traveller Accommodation Unit spent approximately €8.9m on maintenance in traveller specific accommodation. These works will allow for further redevelopment of these sites during the lifetime of the new Traveller Accommodation Programme 2025-2029.

Traveller Accommodation Programme 2025-2029

The Housing (Traveller Accommodation) Act, 1998 requires Dublin City Council to prepare and adopt a 5-year Traveller Accommodation Programme to meet the existing and projected accommodation needs of members of the Traveller Community within its administrative area.

Timeline and Key Actions for the Implementation of TAP 2025-2029

Date	Action
Dec-23	Department Circular received - commence the process of TAP 2025-2029 giving 1 months' notice to stakeholders prior to carrying out assessment of needs
Q1 & Q2 2023	Conduct Assessment of Needs of Traveller community in DCC Administrative Area
Q1 & Q2 2024	Complete Analysis of Assessment of Needs
Q2 2024	Preparation of Draft 2025-2029 Programme
1st July 2024	Publish Draft TAP and commence public consultation
30th August 2024	Closing date for receipt of Submissions
4th November 2024	Submit TAP 2025-2029 to Council for adoption
31st December 2024	Latest date for adoption by Council
Following Adoption by Council	Publication and submission to the Minister of adopted programme

The table below outlines DCC's key targets for 2025-2029 programme.

Overview of Key Targets TAP 2025-2029	
Site Name	Details
Labre Park	18 new units will be built 19 units will be refurbished
32 Camac Park	Refurbishment and extension to existing dwelling Build additional unit on land to side of dwelling
Wards Field/Area A Belcamp	Further development of site to include improvement to services on site and construction of day houses
Cara Estate	Refurbishment of 1 void unit 9 new units to be constructed
Grove Lane	5 new units to be constructed 5 new bays with day houses to be constructed
St Dominic's Park	3 new bays with day houses to be constructed Installation of public lighting and play facilities
Tara Lawns	Upgrade electrical connections and drainage system Resurface existing bays as required Install day houses as required
Northern Close	Refurbishment of 10 existing units and regularising of tenancy agreements
St. Joseph's Park	Resurface existing bays as required Upgrade electrical and sanitation connections Energy Upgrades to existing day houses as required Upgrade of communal area and provision of play facilities
St. Mary's Park	2 new bays Refurbishment and extension on 1 dwelling Liaise with Fingal County Council regarding redevelopment of surrounding areas
Avila Estate	3 new units to be constructed
St Margaret's Park	Redevelopment of site proposed to convert site into group housing scheme with a mix of houses and bays (subject to consultation with residents)
Energy Retro-fit Programme	Roll out retro-fit programme to all group housing schemes. Retro-fit will include: external wall insulation, new windows and doors, new heating systems
Waste Management Programme	Review to be completed of current waste management services and provision of recycling services for each site

Assessment of Needs

The Housing (Traveller Accommodation) Act, 1998 requires Local Authorities to carry out an assessment of needs of Traveller households for whom accommodation will be required during the lifetime of the Accommodation Programme.

This assessments is completed in November of each year and notice of the assessment is sent to the relevant statutory bodies i.e. HSE, Neighbouring Local Authorities, Approved Housing Bodies and key stakeholders, the Local Traveller Accommodation Consultative Committee, Irish Traveller Movement and TRAVACT. Dublin City Council Housing Social Work Section compile the data and while DCC endeavour to capture all families in the traveller community we are reliant on the information available on the date the assessment is carried out on.

A survey of Traveller families living in the Dublin City Council Administrative Area was carried out. The assessment covered both existing needs and future projected needs over the lifetime of the programme. A range of accommodation options were offered i.e. standard and grouped housing, halting sites and private rented accommodation.

Existing Traveller Accommodation Needs

In June 2024 there was 69 DCC Social Housing Applications (*on which the applicants identified as Travellers), comprising of 155 individuals. 6 of the 69 applicants identified are currently classed as having an **AK priority (traveller specific priority).

** As per recommendation of Traveller Accommodation Expert Review July 2019 LA's were required to Introduce an 'ethnic identifier' so that Traveller applicants for mainstream social housing can be identified and progress in meeting their housing needs monitored effectively, was implemented in March 2022.*

***AK priority definition: A household is eligible for an AK priority if they do not have a tenancy of their own, i.e. are homeless, are sharing with another household in an overcrowded situation or are in a mobile. Note: subject to information received by applicant.*

Assessment of Future Accommodation Needs

The survey results indicate that there are 854 Traveller families currently residing in the DCC administrative area in various forms of accommodation indicated in the table below.

Accommodation Types	No. of Families 2023
Standard housing (including those sharing)	407
Group housing Schemes (including those sharing)	202
Traveller Halting Site (including those sharing)	167
Voluntary Housing Associations (AHB)	59
Unauthorised Sites	3
Private Rented (including those sharing)	10
Traveller Specific Acquisitions	4
Private Ownership	2
Total	854

In addition to the table above a report completed in June 2024 for the Dublin City Council Administrative Area indicates there were 51 households (families) identifying as part of the traveller community accessing homeless emergency accommodation. These households (families) consist of 63 adults and 49 children of which 20 are families with children, five couples no children, 26 single adults.

Number of Traveller Households accessing Homeless Emergency Accommodation	
Household Type (families) Breakdown	Number
Families with children	20
Couples (without children)	5
Single Adults	26
Total Households	51

Total Number of Traveller Households accessing Homeless Emergency Accommodation	
Person Type	Number
Adults	63
Children	49
Total persons	112

In accordance with the provisions of the Housing (Traveller Accommodation) Act 1998 and the Minister’s direction, an assessment of the projected accommodation of Traveller families arising during the duration of the Programme i.e. 1st July 2019 to 30th June 2024 has been carried out.

The assessment results indicate there is a demand for additional accommodation for 168 families.

Breakdown of Families Sharing & in EA Accommodation	
Halting Sites	24
Group Housing	58
Basic Service Sites	24
Standard Housing	11
Accessing Homeless Services (June 2024)	51
Requirements	168

The total accommodation need for the 2025-2029 programme is 168 units of accommodation. TAP 2025-2029 sets out how we will deliver the 168 units. These will be achieved by refurbishing existing vacant units, construction of new units, purchase of traveller specific assigned

accommodation, casual vacancies and standard social housing units. Dublin City Council endeavour to provide the following Traveller specific accommodation over a five year period (2025 to 2029).

Type of Accommodation	Min Per Year	Total over 5 year period	Additional Capacity over 5 year period
Traveller Specific New Builds/Refurbishment of Voids <i>Consists of housings/apartment/mobile homes/bays</i>	8	40	30
Standard Housing assigned to Traveller Specific <i>Subject to applicants applying for standard housing</i>	20	100	40
Acquisitions assigned to Traveller Specific	6	30	10
Total		170	80

It should be noted the above does not include the proposed redevelopment of Cara Park and Labre Park group housing schemes regeneration projects. Cara Park is expected to deliver 9 new builds and Labre Park 18 new builds.

Conclusions from Assessment

Having assessed the accommodation requirements of existing Traveller families in the DCC administrative area and the projected need due to family formations and migration. The total accommodation need based on current data for the period 2025 to 2029 is 168 units of accommodation. DCC recognise the uncertainty in accommodation needs and expect the requirement may be higher than 168 units and endeavour to provide an additional 82 units during this period. This surplus will be used to accommodate families experiencing over-crowding

Meeting Needs, Projected Targets and Implementation Measures

Standard Local Authority Housing/Approved Housing Bodies

Through our recent needs assessment, it has been identified that 168 households may require accommodation in standard local authority housing/approved housing bodies during the period of this programme. Offers of standard housing will be made in accordance with Dublin City Council's Scheme of Letting Priorities and having regard to the Council's policy in relation to anti-social behaviour and attendance at pre-tenancy training programmes. The Traveller Accommodation Unit staff will meet and assist Travellers with their Housing Applications. Under the current Programme, allocations were delivered during a housing shortage and it is therefore reasonable to anticipate, with an increased supply, that approximately 250 units (excluding Cara Park and Labre Park redevelopment projects) will be provided under the new Programme.

Construction and Refurbishment Programme on Existing Sites

It is planned to meet some of the accommodation needs of the Traveller Community 2025-2029 with a construction and refurbishment programme as outlined below, subject to funding from the Department of Housing, Local Government and Heritage and subject to Part 8 Planning Approval.

Dublin City Council is planning a refurbishment programme of all of our existing sites which will include a full Energy Retrofit of our Group Housing schemes. These works will help improve accommodation standards and will help sustain the current housing needs within the local Traveller Community.

The refurbishment programme will also help to address design, layout and provision difficulties at these locations. An important part of progressing these works are the consultation process and collaboration with the families living on site. A collaborative approach is required in order to facilitate agreement on an acceptable design for each site. Upgrade, redesign and extension (where possible) works to Day-houses on site will also be introduced so as to better cater for family living.

The construction and refurbishment projects will deliver 60 newly constructed homes; Belcamp Lane Area A 15, Belcamp Lane Wards 15, St. Margaret's 30. In addition it is estimated that a further 130 families will receive offers of Traveller Specific allocations via Standard Housing and Acquisitions.

Waste Management Programme

The Traveller Accommodation Unit's planned Waste Management Programme endeavours to reduce issues with illegal dumping and waste removal across all of our sites. Each family will receive an 1100ltr bin which will be collected on a weekly basis. Recycling services will also be made available to each site as part of this programme.

Retro-Fit Programme

The Traveller Accommodation Unit planned Retro-Fit Programme will be rolled out to TAU Group Housing Schemes over the life time of Traveller Accommodation Programme 2025-2029. The retro-fit programme will include external wall insulation, new windows and doors, new heating system.

North West Area

St Margarets Park

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

The Traveller Accommodation Unit has proposed a full redevelopment of the site so as to convert the site into a group housing scheme. There has been an on-going consultation process with the families on site for a number of years however, it has been difficult to reach an agreed design for the overall site.

While the consultation process remains on-going, based on feedback received to date, the Traveller Accommodation Unit are considering the possibility of providing a more hybrid housing model which will allow for a mix of group housing and more traditional bays with extended day-houses.

Avila Estate

The Avila Estate is located on Cappagh Road, Finglas, Dublin 11. It comprises of three sections total 50 houses – Avila Park (1995), Avila Gardens (2000) and Avila Close (2004).

All 50 houses are currently occupied with an additional three homes due to come under construction in 2025.

Under the Traveller Accommodation Programme 2025-2029 it is planned to complete a full Energy Retrofit Programme of each house on site. This Programme will allow for installation of both internal and external insulation, Heat Pumps and replacement windows along with main entry/exit doors. Once complete these works will significantly reduce the energy spend for families on site.

St Mary's Park

St Mary's Park is located on Dunsink Lane, Finglas, Dublin 11. It is a Group Housing Scheme consisting of 10 houses and was built in 1987.

The Traveller Accommodation Unit are providing 2 bays beside no. 1 St Mary's Park to help reduce overcrowding on site and a planned refurbishment and extension to No.10. The expected completion date is Q2 2025.

A full Energy Retrofit Programme will be completed on all 10 homes.

Dublin City Council continue to work collaboratively with Fingal County Council and with the aim of further redevelopment works of the site including the surrounding areas to enable the provision of additional Traveller Specific Accommodation.

St Joseph's Park

St Joseph's Park is a 14 bay halting site located on Dunsink Lane, Finglas, Dublin 11.

During the Traveller Accommodation Programme 2019-2024 a number of bays and day-houses were refurbished. However, a further upgrade of the overall site is now planned. This will include

resurfacing of bays, upgrade of electrical and sanitation connections and modifications to the existing day-houses to allow for better insulation and energy efficiency.

An upgrade of the communal area on site will also be reviewed with an aim to provide play facilities for families on site.

North Central Area

The North Central area has been particularly problematic in relation to Traveller Specific Accommodation. This is largely due to a low level of available land to redevelop and supply being too low to facilitate demand. However, Dublin City Council are committed to working with the Traveller Community in this area to provide accommodation throughout the lifespan of this Programme and beyond.

Northern Close

Northern Close is located on Belcamp Lane, Coolock, Dublin 17 and was built in 2001. Northern Close was originally a Group Housing Scheme consisting of 12 houses, however, 10 houses remain today.

Plans are currently underway to re-establish authorised tenancies. A full refurbishment of the remaining 10 houses is in the consultation stage. These works, along with a full Energy Retrofit will continue over the lifespan of this Programme. However, it is essential that the families on site are willing to work with Dublin City Council to achieve these goals.

Tara Lawns

Tara Lawns is an 11 bay halting site located on Belcamp Lane, Coolock, Dublin 17. Extensive upgrade and improvement works commenced on site during the Covid-19 Pandemic and Sanitation Units were installed in each bay.

It is planned to further develop this site following the completion of a full consultation process with families on site. A further upgrade of services to site and resurfacing of bays and potential installation of day-houses will form part of the consultation process.

St Dominic's Park

St Dominic's Park, also located at Belcamp Lane, Coolock, Dublin 17, is a 23 bay halting site built in 1996.

While previously a decommissioned site, extensive improvement and connection works were undertaken during the Covid-19 Pandemic which allowed for electrical and sanitation connection's to be re-established. In addition to these works, re-paving of footpaths and resurfacing of bays were completed to allow for the installation of Sanitation Units in each bay. Construction of 3 additional bays is currently planned to help alleviate overcrowding on site.

It is planned to further develop St Dominic's Park to allow for the installation of day-house structures which will reduce the need for Sanitation Units. The Traveller Accommodation Unit is planning to install public lighting and play facilities within the central communal space on site. Provision of a second entry point is also under review subject to Planning and funding approval.

Grove Lane

Grove Lane is located on the Malahide Road, Coolock, Dublin 17. Originally built in 1989, the site consisted of 6 group houses. Owing to their state of significant disrepair, five of the houses were demolished.

Negotiations are currently on-going with occupants of the land so as to progress previously outlined redevelopment plans. It is planned to construct five new houses along with a further 5 bays which will be used to alleviate overcrowding on existing sites in the Coolock area.

Cara Estate

Cara Estate is located on Belcamp Lane, Coolock, Dublin 17. It is comprised of Cara Park (1986) and Cara Close (2001) and includes 41 group houses.

A Pilot Energy Retrofit Programme commenced in 2023 and 28 homes received internal and external insulation, Heat Pumps along with replacement windows and front and back doors. Families have already noted an improvement in their energy costs and the Traveller Accommodation Unit plan to extend the Energy Retrofit Programme to the remaining 13 houses over the coming months.

Currently, 40 houses are fully occupied and one is under refurbishment to allow for re-allocation. Under the Traveller Accommodation Programme 2019-2024 it was proposed to construct nine new, two storey, three bedroom houses – seven at the unauthorised halting site area which is situated on the grounds of the old Community Centre and two, two bedroom houses will be located at the site of the decommissioned FAS Centre. Construction of these properties is planned and will help to alleviate current overcrowding on site.

Wards Field/Area A Belcamp

It is proposed to further develop the previously unauthorised sites at Belcamp Lane known locally as Wards Field and most recently Area A Belcamp. Services to Wards Field were significantly upgraded and extended to families on the site during the Covid-19 Pandemic which allowed for sanitation services to be provided.

These works were further extended to families occupying the lands now referred to as Area A Belcamp.

Dublin City Council hope to complete a more in-depth consultation with families on these sites to put together further redevelopment plans. The redevelopment of these lands will allow for further improvement to services on site and the construction of more structured bay facilities which will include provision of day-houses or more defined group housing, if space allows.

These works will provide an improved quality of life for families occupying the site and will allow Dublin City Council regularise these areas in-line with the current Scheme of Lettings process.

South Central

32 Camac Park

32 Camac Park was purchased for Traveller Specific accommodation. This house will be refurbished and extended to allow for a larger downstairs footprint along with a third bedroom.

The large side garden will be utilised to allow for the construction of a second, two-storey, three-bedroom house. This property will also be used as Traveller Specific accommodation.

Labre Park

During the lifecycle of this programme it is proposed to build 18 new units and refurbish 19 units on this site.

Future Demand

Currently there is a demand for 168 additional, permanent units of accommodation over the next five years. The following targets have been set, subject to funding from the Department of Housing, Local Government and Heritage and subject to Part 8 Planning Approval.

Type of Accommodation	Total Per Year	Total over 5 year period	Additional Capacity over 5 year period
Traveller Specific New Builds	8	40	30
Standard Housing assigned to Traveller Specific	20	100	40
Acquisitions assigned to Traveller Specific	6	30	10
Total	34	170	80

Public Consultation

Dublin City Council consulted with relevant stakeholders, families and communities who are concerned with or affected by proposals for Traveller Accommodation commencing in January 2024 and the final date for submissions was 30th August 2024.

Submissions

Submissions were requested as part of the preparation of this Programme and submissions were received from the following groups:

- HSE National Traveller Health Implementation Group
- Irish Traveller Movement
- National Traveller Women's Forum
- Pavee Point
- Ballyfermot Traveller Action Project
- Cena
- National Traveller MABS
- TRAVACT
- The Irish Coalition to End Youth Homelessness

Each submission has been taken into consideration as part of this Programme. Key proposals in the submissions include strengthening the current cross collaboration and working relationships amongst DCC TAU traveller representative group and statutory and non-statutory bodies. DCC TAU commit to continue to work collaboratively with relevant bodies and, where required, expand and build on current working relationships and inter-agency groups.

Local Traveller Accommodation Consultative Committee

The Local Traveller Accommodation Consultative Committee have, and will continue to play a vital role in the consultation process. They will be consulted on matters relating to Traveller Accommodation and other key issues relating to the Traveller Community.

Community/Interest Groups

It is proposed that Council officials will attend meetings, if requested, to outline proposals for permanent Traveller specific accommodation for particular areas. The Part 8 Planning process under the Local Government (Planning & Development) Regulations 2001 to 2007 and the Planning and Development Acts 2000 to 2006, as amended will apply in respect of all proposals for permanent Traveller specific accommodation.

The Traveller Accommodation Unit

The Traveller Accommodation Unit is responsible for the provision of housing, oversight of management and maintenance of all existing Traveller specific group housing schemes and halting sites within Dublin City Councils boundary. The Unit is responsible for keeping the Traveller Community and the general public informed and up-to-date with proposed developments of permanent Traveller specific accommodation outlined in the Programme. Appropriate staff from the Unit will attend meetings with all key stakeholders, Travellers and resident/community groups

to discuss and inform them of any matters relating to the delivery of Traveller specific accommodation that may affect them.

Management and Maintenance

Dublin City Council are committed to ensuring that all Halting Sites and Group Housing Schemes are managed and maintained to a high standard. The Council will continue in their efforts to improve service delivery and the overall standard of the existing Traveller specific accommodation.

Pre-let Repairs

The Council will ensure that all necessary pre-letting works are carried out to the required standard prior to the letting of Traveller specific accommodation.

Tenancy, Licence Agreements and Payment of Rent

All tenants are required to sign either a Tenancy Agreement or Licence Agreement if they wish to reside on a site under Dublin City Council's remit. The Council will provide a copy of either the Tenancy or Licence Agreement to all tenants and explain its contents before it is signed.

All Traveller Specific tenants are liable to pay a weekly rent charge which will be calculated under the current Differential Rents Scheme. All Licenced tenants will be charged a weekly Licence fee which is a set amount identified in line with the services provided on the site. While Dublin City Council recognise that sometimes unforeseen circumstances can prevent tenants from keeping their rent charges up to date, tenants should be aware that the Traveller Accommodation Unit is there to help tenants when these situations arise. If rent payments are not kept up to date it may have an impact on tenants accessing non-emergency maintenance and repairs services. Repayment agreements can be set up to assist tenants to clear any arrears owed. Once a tenant sticks to a repayment agreement, they can continue to access a full maintenance and repairs service. Rent reviews are carried out on a regular basis and tenants will be notified directly of any changes to their weekly rent charges.

Maintenance & Repair Service

Dublin City Council is responsible for repairs and maintenance associated with general wear and tear of houses and bays. The Council will ensure that all necessary repairs due to fair wear and tear are completed in a reasonable time-frame as set out in the Tenant Handbook. An out-of-hours emergency maintenance service is provided on evenings, weekends and public holidays. However, tenants should also be aware of their own responsibilities with regards to the upkeep of the property. Their responsibilities are very clearly outlined in the aforementioned Tenant Handbook.

Anti-Social Behaviour

It is Dublin City Council's intention to continue to improve upon our practice in managing and responding to anti-social behaviour within our tenancies, refining our processes and approaches in line with Housing legislation, and to explore and take advantage of any new opportunities or initiatives that seek to minimise and mitigate against anti-social behaviour in our neighbourhoods.

Dublin City Council's Strategic Priorities

Our overall objective is to provide safe and peaceful neighbourhoods for Dublin City Council tenants, and their neighbours, to reside and work in. We will aim to prevent and reduce incidences of anti-social behaviour (ASB) in affected communities where citizens are negatively affected. We will deliver this through strategies that are based on Prevention, Partnership, Enforcement, and Continuous Improvement.

Dublin City Council's commitments to prevent and reduce anti-social behaviour are:

1. Proactive Estate Management: Prevention & Early Intervention
2. Working in Partnership: Building Key Relationships
3. Consequences for Anti-Social Behaviour which affects the Community
4. Effective Complaints Response: Efficient Investigation and Proportionate Sanctions
5. Continuous Improvement: Investing in the Delivery of our Strategy

Proactive Estate Management: Prevention and Early Intervention

We commit to good estate management in order to prevent issues escalating into full scale ASB. Estate management recognises that achieving evictions through legal processes can be complex and emphasises the use of all the other powers of the local authority to prevent getting to that point. This section lays out the preventative actions, in relation to estate management checks prior to allocation of housing and designing out crime in new developments. It covers early intervention, engaging tenants at the initial stages of their tenancy, and assistance to tenants, throughout their tenancy, who require support to maintain and sustain their tenancies.

Working In Partnership: Building Key Relationships

We commit to working in partnership to effectively tackle ASB. In recognition that better outcomes can be achieved by a co-ordinated multi-agency response, Dublin City Council will continue to identify, engage, and build working relationships with key personnel in An Garda Síochána and other key external agencies, particularly where the relevant response extends beyond the remit of the Council's authority and where outside expertise is required to resolve issues. The relevant section outlines the variety of partnerships we engage with in order to foster pro-active, preventative and reactive actions to combat ASB and behaviours of concern in our communities.

Consequences for Anti-Social Behaviour (ASB) that affects the Community

We commit to exercising enforcement measures available to us, where ASB has escalated to a scale that is causing serious and persistent disruption to the peaceful and safe enjoyment of one's neighbourhood, community and home. We will consider the use of all reasonable measures available to combat ASB. We will ensure that all tenants are aware of the consequences and

sanctions imposed upon them, pertaining to both their current and future housing options, should they be found to be consistently engaged in anti-social behaviour. While the loss of one's home is the last resort, tenants will be made aware that where preventative and deterrent measures have not been successful, consequences can be severe, up to and including legal action to repossess a tenancy on grounds of ASB. This section lays out the type and duration of consequences for tenants and members of their household or visitors to their home.

Effective Complaints Response: Investigation of Complaints & Associated Action

We commit to providing an accountable system of managing complaints related to ASB, supported by robust policy and procedures. We will take every complaint seriously: recording, assessing, investigating and managing complaints, from lesser breaches of tenancy agreements, to those of a more serious nature. Every complaint will be treated confidentially. In our processes, we will guarantee procedural safeguards are in place, following due process, ensuring a fair and impartial investigation of complaints, with measures imposed which are proportionate to the findings. The Housing (Miscellaneous Provisions) Act 2009, prescribes that a local authority's ASB strategy must detail its procedures for dealing with ASB. This section lays out the process in more detail, including the categorisation of complaints, the complaints process, and the variety of potential actions that can be taken by the Council, arising from the findings of the investigation.

Investing in Delivery of our Anti-Social Behaviour Strategy

Dublin City Council is committed to delivering on actions and targets detailed in this strategy. Area Offices have the primary responsibility to respond to ASB in their areas of operation, supported by a dedicated team in the Central Office, who provide technical support and will be responsible for monitoring the delivery of the identified strategic actions. This section lays out the responsibilities of each section. It also lays out details in terms of investment in staff training and in evaluating our process around complaints management, as well consideration of investment in evaluation and/or research around specific interventions to mitigate and/or reduce anti-social behaviour in social housing settings, as set by the Housing (Miscellaneous Provisions) Act 2009. We are committed to being accountable and examining our reporting systems, so that that we can provide a comprehensive picture of the work carried out by our office in terms of mitigating and managing ASB and delivering safer neighbourhoods.

Dublin City Council is committed to the provision of safe, thriving neighbourhoods. We aim to ensure that tenants and their neighbours can live peacefully in their homes and communities. We will take all appropriate steps to prevent and reduce behaviour that compromises this objective.

Conclusion

This Traveller Accommodation Programme (TAP) is a five year programme which outlines how Dublin City Council intends to meet the current and predicted accommodation needs of the traveller population during the lifetime of the plan.

The Programme details the actions Dublin City Council will implement to meet the current and future accommodation needs of Traveller families within the county over the course of the next 5-years.

Dublin City Council are committed to the delivery of the key objectives outlined in the Traveller Accommodation Programme 2025-2029. DCC will continue to work collaboratively, actively engage with all stakeholders and the traveller community during the lifecycle of this programme.

Appendix A – Definitions

Definitions

TAP – Traveller Accommodation Programme

DCC – Dublin City Council

TAU – Traveller Accommodation Unit

Halting Site - is a site with individual bays, with a full range of services provided with a small structure referred to as a day-house or sanitation unit.

Group Housing Scheme - is a development of houses built specifically for members of the Traveller Community.

Basic Service Site - is a site which was previously unauthorised but which now has licensed occupiers along with basic sanitation services.

Transient Halting Site - is a site providing basic facilities for short-term use by families pursuing a nomadic way of life or visiting relatives.

Appendix B

Submissions draft Traveller Accommodation Programme 2025-2029

- HSE National Traveller Health Implementation Group
- Irish Traveller Movement
- National Traveller Women's Forum
- Pavee Point
- Ballyfermot Traveller Action Project
- Cena
- National Traveller MABS
- TRAVACT
- The Irish Coalition to End Youth Homelessness



7. That anti-racism and cultural awareness in-service training are undertaken by LTACC members as Local Authority staff as per Section 42, Irish Human Rights and Equality Act (2014).

Appendix 1- NTHAP relevant actions

RS	Consolidate the public health measures put in place to minimise the impact of COVID-19 and other communicable diseases on Travellers, including primary childhood immunisation programmes, control of outbreaks such as hepatitis A, and COVID-19 vaccinations.	HSE Public Health + Local Authorities + other relevant agencies.	NTRIS (Action 79) Healthy Ireland: A Framework for Improved Health and Wellbeing
SA	Public Health Departments and regional Traveller Health Structures to work in partnership with local authorities and Government Departments, as appropriate to address the social determinants of Traveller Health.	HSE Public Health + other relevant agencies.	Healthy Ireland: A Framework for Improved Health and Wellbeing

¹ UCD (2010) All Ireland Traveller Health Study Team. *All Ireland Traveller Health Study: Summary of Findings*. https://www.ucd.ie/lt4cms/AITHS_SUMMARY.pdf



ANTI-RACISM AND CULTURAL AWARENESS TRAINING

NTHAP recognises the importance of anti-racism and cultural awareness training for HSE staff and has a number of actions that relate to Traveller-proofing of mainstream services including cultural awareness and anti-racism training. As per the National Plan Against Racism, there is a recognition that systemic racism permeates throughout institutions and structures, including public services, adding further challenges to Travellers who are seeking appropriate support and accommodations provisions from their Local Authority. Therefore, we propose availability of anti-racism and discrimination in-service training for staff in Local Authorities and LTACC members. The HSE welcomes engagement and participation of local authority representatives in the delivery of NTHAP at local levels through engagement in NTHAP implementation structures.

KEY RECOMMENDATIONS

The following recommendations should be underpinned by the 10 common basic principles of Traveller and Roma inclusion as adopted by the European Commission and the National Traveller and Roma Inclusion Strategy. These principles, commit to stakeholders working in partnership at all levels, including government departments, statutory agencies, Travellers and Traveller organisations.

TAP 2025-2029 should ensure:

1. That the Traveller Accommodation Programme (TAP) provides for good quality, energy efficient, culturally appropriate Traveller specific accommodation that adequately takes account of the current and future accommodation needs of Travellers in the local authority area.
2. The environment, in which Traveller specific accommodation is located, should be conducive to maintaining positive mental and physical health. A framework for improving environmental health in Traveller accommodation should be developed and incorporated into the TAP
3. Health Impact Assessments should be a prerequisite in the design of Traveller accommodation. These should also be undertaken in existing Traveller accommodation and reviewed during the lifetime of the TAP.
4. That Traveller accommodation targets reflect existing and future needs of Traveller populations to address Traveller overcrowding and homelessness. This can be supported by acting in partnership with Traveller representatives in the assessment of needs process. These processes must plan for the needs of the most marginalised Travellers, in particular those living on unauthorised sites with little access to water, sanitation, electricity and heat, and those in overcrowded situations, in homelessness, and in homeless accommodation.
5. That building on the positive work as a result of Public Health measures put in place during the COVID-19 Pandemic, Local Authorities continue to work closely with HSE Public Health, HSE Social Inclusion, Traveller Health Units and Traveller organisations to support and enable improvements in Traveller health, particularly in relation to the most vulnerable Travellers.
6. That a universal ethnic identifier (in line with human rights standards) to be implemented and rolled across all routine administrative datasets in Local Authorities as per NTRIS.



TRAVELLER HEALTH STATUS

Travellers experience significant health inequalities as a result of social determinants of health. Mortality rates in the Traveller community are 3.5 times higher than non-Travellers with life expectancy 13.3 years less. The rate of suicide amongst Travellers is 6 times higher than in the general population and accounts for around 11% of all Traveller deaths. Infant mortality rates in the community is 4 times higher than in the general population, with chronic health conditions disproportionately affecting Travellers contributing to the mortality gap. This is seen in higher rates of cardio vascular disease, diabetes and hypertension (12% diagnosed with diabetes and over 10% with undiagnosed diabetes).

SOCIAL DETERMINANTS OF HEALTH

The social determinants of health (SDoH) are the non-medical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life. Accommodation is a key determinant of health. The AITHS found that the better accommodated a Traveller family is the better their health status, stressing the importance of good quality accommodation and amenities in supporting and maintaining good health. The importance of access to good quality accommodation to enable and support positive health including mental health cannot be underestimated. For those living in Traveller specific accommodation, TAPs need to ensure well-maintained sites that are located close to local amenities, with proper sanitation facilities, energy efficient homes, adequate space for families and play facilities for children, as these are essential in supporting and enabling good health outcomes.

PARTNERSHIP WORKING

NTHAP is underpinned by partnership working; this includes HSE Public health, regional Traveller health structures and HSE social inclusion staff working alongside local authorities and government departments, as appropriate, to address the social determinants of Traveller health (Action 36). We welcome the continuation and strengthening of this partnership as part of the Traveller Accommodation Programme. We see an important role for Public Health in supporting and advising the Local Authority in ensuring Traveller accommodation enables and supports good physical and mental health through various means including the provision of Health Impact Assessments for existing and planned Traveller Accommodation in the lifetime of the TAPs.

ETHNIC EQUALITY MONITORING

A key element in ensuring adequate provision of Traveller accommodation is to ensure the robust monitoring processes. These processes can be supported by ensuring implementation of ethnic equality monitoring, including the introduction of a standardised ethnic identifier in line with the national census, across all relevant local authority data sets. This includes datasets for social housing and accommodation, allocations of social housing and accommodation and on homelessness. While we acknowledge that there have been some improvements in relation to data collection, including the addition of a question to capture Travellers in the social Housing Support application form, we recommend this be amended and updated as a universal ethnicity question (as per the census) in line with a human rights based approach.



INTRODUCTION

The HSE National Traveller Health Implementation Group (NTHIG) was established in May of 2023 to oversee the implementation of the National Traveller Health Action Plan 2022-2027 (NTHAP)¹. In the tradition of HSE approaches to Traveller health, the group is a partnership between HSE and Traveller representatives with representation from the Department of Health. Our role is to drive implementation of the National Traveller Health Action Plan 2022-2027, to direct, support and engage those involved in implementation, to monitor and report progress against expected outcomes and to ensure delivery of the plan. We welcome the opportunity to make a submission to the consultation process for the development of the Traveller Accommodation Programmes 2025-2029.

HSE NATIONAL TRAVELLER HEALTH ACTION PLAN 2022-2027 (NTHAP)

The NTHAP, launched in November 2022 is long awaited plan that sets out to address Traveller health inequalities and is informed by a social determinants approach to health. The plan has a clear implementation strategy, working in partnership with Traveller Health Units, local Traveller organisations/Traveller Primary Healthcare Projects and public bodies that provide services that affect Traveller Health and wellbeing. The plan has 4 goals, 9 strategic objectives and 45 actions. The four goals are:

1. Strengthening the governance, monitoring and structures to support implementation of the National Traveller Health Action Plan
2. Improving Traveller's equality of access, participation and outcomes in mainstream health services through a human-rights based approach
3. Addressing the social determinants of Traveller health through targeted and mainstreaming measures
4. Enhancing Travellers' access to culturally appropriate primary health care through investment in Traveller Health Units and Primary Health Care for Travellers Projects

Goal 3 sees a number of actions related to partnership working with Local Authorities. These are in relation to; addressing the impact of homelessness on Traveller Health, consolidating public health measures to minimise the impact of COVID-19 and other communicable diseases, and in working to address the social determinants of health, and through participation on Local Authority structures to inform on Traveller health priorities. (See Appendix 1).

NTHAP was developed following an extensive consultation process with Travellers, Traveller organisations, HSE colleagues and other relevant stakeholders including public bodies. NTHAP is underpinned by Traveller Inclusion, community development and partnership working. It draws on the findings of the All Ireland Traveller Health Study (AITHS)¹, (a seminal study still relevant in the current context) in its understanding of Traveller health inequalities.

The plan takes a social determinants approach to health in line with key government policies and strategies including- Sláintecare, Healthy Ireland and the National Traveller and Roma Inclusion Strategy 2017-2021. The latest Healthy Ireland Implementation Plan 2023-2027 makes strong commitments to addressing health inequalities through a whole government approach. The strategy also promotes partnerships and cross-sectoral working including greater collaboration between health services and Local Authorities.

¹ <https://www.hse.ie/eng/services/publications/socialinclusion/national-traveller-health-action-plan-2022-2027.pdf>



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7th February 2024

To: The Traveller Accommodation Unit

From: Aishling Heffernan, Chair of the HSE National Traveller Health Implementation Group

**Submission by the National Traveller Health Implementation Group to the consultation
process for Traveller Accommodation Programmes 2025-2029**

To whom it concerns

The National Traveller Health Implementation Group (NTHIG) was established to oversee implementation of the National Traveller Health Action Plan 2022-2027 (NTHAP). The plan sets out to address serious inequalities in Traveller health over the five-year period. Travellers have significantly poorer health outcomes than the general population, including higher mortality rates, higher infant mortality rates, lower life expectancy, higher suicide rates and higher rates of chronic disease. Goal 3 of the NTHAP '*to address the social determinants of Traveller health through targeted and mainstreaming measures*' includes a series of actions related to the social factors that affect Traveller health. Accommodation is a key social determinant of health and there are a number of accommodation related actions in the NTHAP, which include the HSE working in partnership with the local authority.

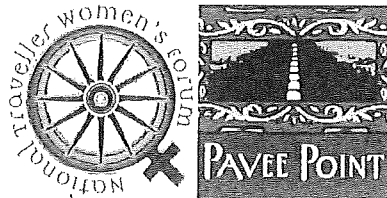
We welcome the opportunity to make a submission to the Traveller Accommodation Programme 2025-2029 consultation process. We would also welcome further engagement with our Local Authority colleagues to work in partnership through local and regional structures in relation to addressing the accommodation related social determinants of Traveller health as part of the implementation of the National Traveller Health Action Plan.

Thank you in advance for your consideration of this submission.

Kindest regards

Aishling Heffernan

**Chair of the National Traveller Health Implementation Group, Chief Officer Community
Health Care East**



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

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

February 2024

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

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

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

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

Traveller ethnicity

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Traveller Accommodation Legal and Policy Obligations

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

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

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

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

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

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

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

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

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

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

a) Include specific actions in future Traveller Accommodation Programmes (TAPs), to address youth homelessness'.

b) Work with the LTACCs to consider and put in place any additional supports that are required at a local level to assist young Travellers who are at risk of experiencing homelessness'.

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

Policy Reforms and Reviews since the TAP 2019-2024

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

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

The Office of the Planning Regulator conducted a Case Study Paper entitled Traveller Accommodation and the Local Authority Development Plan 2021¹¹, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.

Current Need

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

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

Social Housing Delivery Trends.

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

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

Need for Traveller for Traveller Homelessness Task Forces.

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

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

Demographic trends since the last TAP

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

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

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

Consultation

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

Consultation Process

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

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

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

Statement of Strategy

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

Assessment of Needs

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

Traveller Accommodation Expert Review July 2019²²

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

Expert Review Recommendation A.8:

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

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

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

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

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

Traveller Specific Accommodation

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

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

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

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

Development of Transient Sites

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

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

Tenant Participation

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

Caravan Loan Scheme

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

Fire Safety in Traveller Accommodation

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

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

Proposed Checklist for development of Traveller Accommodation Programmes 2025 - 2029

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

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

Appendices

Appendix A

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

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

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

Appendix B

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

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

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

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

Appendix C

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

Public bodies

42. (1) A public body shall, in the performance of its functions, have regard to the need to—

- (a) eliminate discrimination,
- (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
- (c) protect the human rights of its members, staff and the persons to whom it provides services.

(2) For the purposes of giving effect to subsection (1), a public body shall, having regard to the functions and purpose of the body and to its size and the resources available to it—

- (a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and
- (b) report in a manner that is accessible to the public on developments and achievements in that regard in its annual report (howsoever described).

(3) In assisting public bodies to perform their functions in a manner consistent with subsection (1), the Commission may give guidance to and encourage public bodies in developing policies of, and exercising, good practice and operational standards in relation to, human rights and equality.

(4) Without prejudice to the generality of subsection (3), the Commission may—

- (a) issue guidelines, or

(b) prepare codes of practice in accordance with section 31,

in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.

(5) Where the Commission considers that there is evidence of a failure by a public body to perform its functions in a manner consistent with subsection (1) and that it is appropriate in all the circumstances to do so, the Commission may invite the public

body to—

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

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

or both.

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

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

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

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

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

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

(a) may, or

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

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

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

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Submission to the Draft Traveller Accommodation Programme in Dublin City Council

As a recognised Approved Housing body, led by Travellers, Cena is already involved across a number of local authorities in:

- Construction of new homes, where the emphasis continues to be on ensuring key culturally appropriate elements, encouraging full tenant involvement and (most importantly) maintaining a future-proofing procedure that can ensure long-term sustainability.
- Redevelopment of existing sites and settlements, guided by the same key principles
- Purchase of individual properties.
- Carrying out accommodation needs assessment (this takes place either with specific extended families or, more recently on a town, regional or county basis).

All Cena developments, and all tenancies created, are designed, facilitated and managed on a Traveller-to-Traveller basis – Cena staff being members of the Traveller community who are fully trained in needs assessment, outreach and tenant liaison.

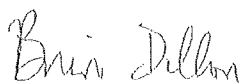
We see the completion of your current Traveller Accommodation Programme as offering the opportunity to establish a structured working relationship with Cena (or to strengthen and deepen this relationship between Cena and the local authorities with whom we already work).

We are asking that you acknowledge this opportunity in your TAP, and ask that you reflect your willingness to consider establishing or strengthening a Cena working relationship in one or more of the following ways

1. Firstly, in engagement with specific Traveller families with a view to *assessment of individual accommodation needs* in the longer term. This engagement will be undertaken on a Traveller-to-Traveller basis, in partnership with trained Cena outreach workers who are all members of the Traveller community. We see this process as being important in efforts to ensure that accommodation solutions are appropriate, future-proofed and sustainable in the longer term – whether resulting in the acquirement of specific properties or in the development of group housing responses.
2. Secondly, in planning, designing and developing *new accommodation*. The partnership with Cena will ensure full involvement of Traveller families in the process and in the development of good practice in provision of Traveller-appropriate accommodation. A successful starting point, in some local authorities already, has been in the redevelopment of existing halting sites. Such

- redevelopment has been, and will always be, planned in accordance with results of a 'feasibility study'. Cena will carry out the study – based on in-depth consultation with all residents.
3. Thirdly, in undertaking a more extensive, local authority-wide, *assessment of accommodation needs*. Cena has already undertaken such assessments in Clare (across the county) and in Longford (covering all of Longford town). Even though this is a more time and resource intensive process, we firmly believe in the value of the exercise. We have consistently experienced shortcomings in the more traditional ('paper-based') means of assessing Traveller accommodation needs. A more in-depth engagement with Traveller households (undertaken by Travellers trained in outreach) yields a much more reliable and realistic understanding of accommodation needs and wishes. While the process is more resource-intensive, we are fully convinced that results from such a needs analysis can provide a solid foundation for strategic planning – not only to underpin the current Traveller Accommodation Programme, but as a baseline from which future TAPS can be planned.
 4. Fourthly, in addressing specific challenges involved in *Traveller homelessness*. Cena are prepared to enter into Service Level Agreement arrangements (supported under Section 10 funding) to undertake a joint structured programme to establish:
 - a. The extent and nature of Traveller homelessness in your catchment area.
 - b. Feasible and appropriate ways in which emergency provision can be made
 - c. Feasible and appropriate ways in which pathways out of homelessness can be plotted
 - d. Joint working agreements through which solutions can be brought forward.
 5. Fifthly, ways in which *other Approved Housing Bodies* can become actively involved in delivery of appropriate accommodation for Travellers. Following on from recommendations contained in the Expert Review Group on Traveller Accommodation (2019), and subsequent support from the Department of Housing, Local Government and Heritage, Cena are now cooperating with a number of other AHBs who are committed to delivery in a partnership way¹. This Cena-led partnership can also be specified as an approach to addressing particular accommodation challenges identified in your Traveller Accommodation Programme.

Please get in touch if you think more information from us may be useful to you



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¹ These include Circle Housing, Respond, Cluid and Simon Community

TAP 2025 submission from Ballyfermot Travellers Action Project. (August 2024)

In order to decide the direction of the next TAP it is important that we review the outcomes from the most recent TAP. To do this we have set out the main points in respect of Traveller accommodation, taken from the mid-term review carried out by Dr Sean O Riordain.

Analysis of 2018 Mid-term Tap Review.

The Tap review carried out in 2023 reveals that between 2018 and 2021 there was a number of significant shifts in Traveller accommodation.

This breaks down as follows

1. Families living in precarious/shared accommodation has increases by 95 families.
2. In Traveller specific accommodation authorised and unauthorised we see a net loss of accommodation for 45 families
3. In DCC standard accommodation, there is an increase of 56 families
4. In AHB accommodation has seen an increase of 27 families
5. In private rented accommodation there is a decrease of 4 families

Also exposed in these figures is the fact that Traveller specific accommodation has decreases by 69 units (unauthorised 66 and authorised 3 units). This is a trend that is also evident in the new draft TAP for 2024 2029. This decline needs to be addressed immediately. The submission below sets out areas where it can be addressed.

With over 5% of the Traveller community now in homelessness, we can see that the reduction in Traveller specific accommodation and families living in overcrowded and precarious accommodation is playing a significant part in Traveller families finding themselves in homelessness. This is further compounded by private rented accommodation becoming more inaccessible to the Traveller community.

It is obvious from this that the current system of providing Traveller accommodation has not resulted in an increase supply of Traveller specific accommodation and a completely new approach is needed.

Proposals for the New TAP

The figures produced by DCC in the draft 2024 2029 Tap show that over 5% of Traveller households are living in emergency homeless accommodation this compared to 0.7 of the general population. These figures are stark and bring the urgency for additional Traveller accommodation into sharp focus.

Therefore, the primary focus of this TAP should be the delivery of Traveller specific and culturally appropriate accommodation. Yet the one issue that has plagued TAP's in the past has been the lack of delivery on Traveller specific accommodation. If the 2025 TAP is to have any credibility it needs to take a new and decisive direction. One that address this issue and one that has the support at the highest level in Dublin City Council. This we believe requires the City manager, Housing SPC, Traveller Accommodation Unit manager and the LTACC to put its full weight behind the 2025 TAP. Should we simply continue on with the same old approach that has failed to deliver on Traveller accommodation for the past quarter of a century, we are set to fail the Traveller community once again.

It also has to be recognised that Central Government has a significant part to play in the delivery of Traveller accommodation. In recent years we have seen that Dublin City Councils willingness to make

progress has been stifled by central governments restrictions on funding for capital projects and the financially ill-conceived and underfunded caravan loan scheme. We believe that this needs to be addressed as a matter of urgency. In particular it is our belief that the Councillors on the LTACC along with DCC have a responsibility to raise this at a local level through local authority channels and their respective political parties at a national level.

In light of the above we are making the following recommendations.

- Dublin city Manager should take a lead role on the building of Traveller specific accommodation, as set out in the new TAP. Regular Progress reports should be made to the manager on a six monthly basis to the LTACC and the Housing SPC.
- Ambitious but at the same time realistic and achievable targets need to be set for the building of Traveller Specific accommodation over the course of the new TAP. These targets should be set in collaboration with Local Traveller organisations and Traveller reps at the LTACC.
- Target dates need to be set for all projects. Where these are not met a full explanation should be delivered to the LTACC and the housing SPC
- DCC needs to identify and report on state/ DCC land that can be used for the building of Traveller Specific accommodation. This report should be delivered to the Housing SPC and the LTACC within the first 6 months of the new TAP.
- DCC TAU should identify private land that could be acquired for the building of Traveller specific accommodation. Again a report on available land for this purpose should be reported to the Housing SPC and LTACC within the first 6 months of the new Tap.
- Any land identified by DCC TAU, should be included by the City manager in future Dublin City Development plans.
- A percentage of all land secured by DCC or LDA for social housing shall be reserved for Traveller specific housing.
- Under "Traveller Specific Accommodation to be delivered" the plan proposes delivering 250 homes over the 5 years. Of the 250 houses to be delivered only 50 are Traveller specific the remaining 200 are standard accommodation. The first point to make here is that only 20% of the Traveller specific. While the other 80% are partially referred to as Traveller specific in reality in most cases they are standard housing occupied by Travellers. We are calling for this to be reversed to a position where 80% is Traveller specific and 20% is standard accommodation. The second point to be made here is that no account has been taken of new family formations or the increase in population numbers in the Traveller community which according to the Census 2022 figures is 6%. We are calling for both these factors to be accounted for in the final TAP.
- In respect of the IHREC equality review on Traveller accommodation, the 9 recommendations made should be implemented without delay. Within these recommendations I would draw particular attention to point 1 and 3. Point 1, calls for a detailed census of Traveller accommodation needs. This should include current and future needs and incorporate points previously made in relation to population growth and new family formations. Point 3, calls for the establishing and implementation of an ethnic identifier.
- DCC TAU in collaboration with the LTACC should look at the provision of transient sites. A special meeting of the LTACC should be set aside for this purpose.

- Houses purchased by DCC TAU for Traveller specific accommodation shall be held by the TAU as housing stock specifically for Traveller housing needs. TAU should continue to support Traveller families who move to accommodation in the settled community.
- LTACC to receive a six monthly report on capital spending.
- DCC in collaboration with Traveller community and relevant services such as An Gardaí and HSE should develop an interagency working group on Estate Management. When developed the estate management system will offer a, safe, secure and healthy environment in which to live and work.
- The interagency estate management working group will meet under the auspices of the LTACC on a 6 monthly basis to discuss to review Estate management.
- As directed by the NTRIS II DCC should implement the recommendations of the Traveller Accommodation Expert Review 2019. Included in this are recommendations for the LTACC to be replaced by a Traveller Accommodation Strategic Policy Committee, TASPC. Despite the best efforts of parties to the LTACC, no progress of any significance has been made since its inception.

The Public Sector Equality and Human Rights Duty

We also call for the 2024 2029 TAP to take full cognizance of and have regard for the “Irish Human Rights Equality Commission Act 2014” as is required by law. In that it should eliminate discrimination, promote equality of opportunity to whom it provides a service and protect the human rights of persons to whom it provides a service.

We understand that most other areas of DCC work are equality proofed using the Irish Human Rights Equality Commission Act 2014. Considering the historic inequality suffered by the Traveller community it is therefore essential that this level of scrutiny in relation to equality is applied to the 2024 2029 TAP.

Local issues

- The Upgrade of Labre Park should commence without any further delay. This upgrade was to be carried out following the intervention of the HSE and the Office of the Ombudsman for Children in 2020, due to the outbreak of Hepatitis A. A recent inspection by HSE Public Health found that conditions on site continue to expose the residents of Labre Park to a further outbreak of Hepatitis A.
- While the latest plan for the regeneration of Labre Park is welcomed. The timelines set out in this plan need to be strictly adhered to and any slippage needs to be reported on and accounted for to Housing SPC, LTACC and Labre Park Regeneration Committee.

The opinion of the Traveller community in Labre Park in relation to the delays on the upgrade and regeneration of Labre Park can be summed up by the Labre Park Traveller Children when they stated in “Hearing the Voice of Ballyfermot Traveller Children” report about possible upgrades to Labre Park:

“Is it going to happen? Is it really going to happen?”



TAP 2025 submission from Ballyfermot Travellers Action Project. (April 2024)

In order to decide the direction of the next TAP it is important that we review the outcomes from the most recent TAP. To do this we have set out the main points in respect of Traveller accommodation, taken from the mid-term review carried out by Dr Sean O Riordain.

Analysis of 2018 Mid-term Tap Review.

The Tap review carried out in 2023 reveals that between 2018 and 2021 there was a number of significant shifts in Traveller accommodation.

This breaks down as follows

1. Families living in precarious/shared accommodation has increases by 95 families.
2. In Traveller specific accommodation authorised and unauthorised we see a net loss of accommodation for 45 families
3. In DCC standard accommodation, there is an increase of 56 families
4. In AHB accommodation has seen an increase of 27 families
5. In private rented accommodation there is a decrease of 4 families

In overall Traveller accommodation, we see a need for an additional 95 units of accommodation and this would just allow us to stand still.

Also exposed in these figures is the fact that Traveller specific accommodation has decreases by 69 units (unauthorised 66 and authorised 3 units).

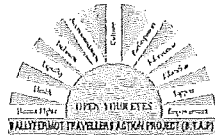
We think it is fair to extrapolate from these two previous figures that the reduction in Traveller specific accommodation plays a significant part in Traveller families finding themselves in homelessness or precarious accommodation

It is obvious from this that the current system of providing Traveller accommodation has not resulted in an increase supply of Traveller specific accommodation and a completely new approach is needed.

Proposals for the New TAP

The primary focus of any Tap should be the delivery of Traveller specific and culturally appropriate accommodation. Yet the one issue that has plagued TAP's in the past has been the lack of delivery on Traveller specific accommodation. If the 2025 TAP is to have any credibility it needs to take a new and decisive direction. One that address this issue and one that has the support at the highest level in Dublin City Council. This we believe requires the City manager, Housing SPC, Traveller Accommodation Unit manager and the LTACC to put its full weight behind the 2025 TAP. Should we simply continue on with the same old approach that has failed to deliver on Traveller accommodation for the past quarter of a century, we are set to fail the Traveller community once again.

It also has to be recognised that Central Government has a significant part to play in the delivery of Traveller accommodation. In recent years we have seen that Dublin City Councils willingness to make progress has been stifled by central governments restrictions on funding for capital projects and the



financially ill-conceived and underfunded caravan loan scheme. We believe that this needs to be addressed as a matter of urgency. In particular it is our belief that the Councillors on the LTACC along with DCC have a responsibility to raise this at a national level through local authority channels political party organisations.

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

February 2024

About National Traveller MABS

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendations for the Traveller Accommodation Programme 2025-2029

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

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

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

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

Trailer Loan Scheme

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

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

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

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

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

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

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

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

Trailer Rental Scheme

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

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

Addressing fuel poverty

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

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

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

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

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

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

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

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

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

⁹ IBID

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

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

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

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

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

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

Community Consultation

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

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

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

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

Public Sector Duty

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

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

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

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

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

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

Equality Reviews

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

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

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

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

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



TravAct is a registered charity with the Charities Commission, No. 2020-5673.
TravAct is a registered company with the Companies Registration Office, No. 245190.

TravAct,
The Resource Centre,
Clonshaugh Drive,
Priorswood,
Dublin 17.
Eircode D17 TK75
Tel. +353 (0)1 848 6515

31st May 2024

To:
Dublin City Council

Re: TRAVACT PROPOSAL FOR TRAVELLER ACCOMMODATION PLAN 2024-2029

Dera Council,

We wish to present the following proposal to, for inclusion in the
Traveller Accommodation Plan 2024 – 2029.

We welcome your considered response, and we look forward to working
with you to seek to improve the accommodation conditions for members
of the Traveller Community.

The lead person and point of contact within TravAct is our
Accommodation Worker, Winnie McDonagh.

Northside Travellers Support Company Limited by Guarantee, trading as:- TravAct, is
registered in Dublin as CRO #245190, registered office at The Resource Centre, Clonshaugh
Drive, Priorswood, Dublin 17. Eircode D17 TK75. Registered Charity Number:
RCN # 2020-5673. Directors: Paddy McDonagh (Secretary), Micheal Collins, Sally Flynn,

TRAVACT PROPOSAL FOR TRAVELLER ACCOMMODATION PLAN 2024-2029

CARA PARK - CARA CLOSE

We propose that suitable sites be developed for Travellers' specific group housing to meet the needs of 29 families living in Cara Park and Cara Close.

There are 9 families in the units in Cara Park and 3 families in an unofficial site in Cara Park. We propose that the 9 new houses planned for Cara Park go ahead on the date agreed by DCC by September 2024.

It's also necessary for the 12 families that temporary accommodation should be provided for, as the land at the units needs to be freed up for the new development to start.

3 families are on an unofficial part of Cara Park, and 9 families are at the units. In the next 2 years, the numbers are going to rise due to the overcrowding of Cara Park, with more young people getting married.

TARA LAWNS

Tara Lawns is very run down at the present time, and there is a great need to have the site refurbished for the families who are living there. There's a major problem with the sanitation because of an overflow of sewer that needs to be addressed as soon as possible.

NORTHERN CLOSE

Northern Close used to be a 12-group housing, now there are only 11 houses. Number 1 Northern Close needs to be rebuilt because of a shortage of accommodation. Northern Close needs to be upgraded with the Retrofit.

ST. DOMINICS

St. Dominic's is in need of street lighting and stronger electrical voltage in all of ST Dominics.

GROVE LANE

There is only one official house in Grove Lane.

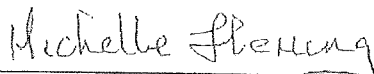
Grove needs to be redeveloped because of a shortfall of accommodation for traveling families.

UNOFFICIAL SITE IN TRAVACT AREA OLD BELCAMP LANE

Families that are living in Old Belcamp Lane have very poor electricity, no sanitation, and amenities, with the exception of Portaloo's. There is also a major drainage problem which is a health risk to all who are living there. These unofficial sites need to be redeveloped in consultation with the families.

Any new developments in Area B, we are proposing that traveller-specific group housing and sites should be included at the outset of these plans.

Yours Sincerely,



Michelle Fleming
General Manager
TravAct.

Winnie McDonagh
Accommodation Worker
TravAct

IRISH COALITION TO END YOUTH HOMELESSNESS

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

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

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

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

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

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

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

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

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

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

³ Action 2.

⁴ Action 4.

⁵ Action 8.

⁶ Action 15.

⁷ Action 23.

