

Appendix 3 : Submissions received during public consultation period from

- A) Tallaght Travellers Community
Development Group**
- B) Cena Housing Association**
- C) Irish Traveller Movement**
- D) Councillor Gus O'Connell**
- E) Clondalkin Travellers
Development Group**

Comments Re submission in relation to the Draft TAP
2014-2018 Programme from Tallaght Traveller CDP

Dear Mr Sinclair,

I am disappointed at the LTACC meeting on the 24th September which was the opportunity for all to have a good look at the Draft T.A.P and to identify key sections which are relevant to Travellers and their accommodation needs. It appears that a number of important issues have been overlooked.

Where all the relevant topics appropriate to the Traveller Accommodation Unit seem to have, all the boxes ticked, none of the important issues submitted by Tallaght Traveller Community Development Project and its clients seem to be prioritized. Commencing with the Statement of Strategy within the reply of the Local Authority on the submission, it states that the TAP 2014-2018 is designed and informed by SMART principles.

If this was the case the submission would have been left in its entirety unfortunately it has been edited down and dialogue reworded. Which is omitting the body and argument of the submission.

Tallaght Traveller CDP is recommending that the voluntary housing agencies are invited onto the LTACC & sub committees along with the County Manager in order to bring new experience & ideas to the table.

Within the draft none of the agencies have been identified nor are there any references made as to how and when the agencies will be involved in TAP 2014-2018.

1.1 TTCDP Submission New Residential Caravan Parks / Day units with Bay
Tallaght Traveller CDP is asking that new developments are kept to a minimum of 3 to 4 units. This will allow for cohesion among families, help create a better sense of ownership and be in a better position to maintain the surrounding open areas. All new units should have the best of building materials used in their construction and that all new builds should be located within or beside more seasoned housing estates which have all the necessary amenities around them shops, schools, playgrounds, parks and churches.

Looking at the Draft TAP 2014-2018 the submission for the Residential Caravan Parks is still allowing for eight to ten bay sites thus our recommendation has not been taken on board. If the Draft TAP was governed by SMART principles this would have been acknowledged. Also most of the new development sites have yet to be finalised or secured.

2.1 TTCDP Submission Transient Accommodation

There has been no change in the status quo. TTCDP would encourage the new County Manager of South Dublin County Council to take the lead here as no other local Authority have the will to forward this project, which will only work if all local authorities nationwide are prepared to move forward on the initiative. Tallaght Travellers would like to see this as a priority piece of work in the TAP 2014 – 2018.

This is the third TAP that's nine years from the original to date and between the Local Authorities Nationwide and within the greater Dublin area there is still no solution to this topic. One would have to question the level of commitment!

3) TTCDP Submission Interagency Traveller Strategy

There are two levels to this. Level one line managers meet on a quarterly basis and in principle are to work as a collective on submissions / actions made from each agencies involved which in turn formulate a strategy one to ten where each agency is committed to a task. The reality is that these meetings serve more as a frontline Network meeting where each organisation in attendance gives an update of what is new. TTCDP value the opportunity to meet and share relevant information with all the agencies as it benefits the health & wellbeing of Travellers.

Level two is a higher level group with senior executives from each of the agencies meeting on a quarterly basis. Unfortunately there are no Traveller's permitted to participate on this group. Tallaght Travellers are concerned as to the role and relevance of the group given there are no Travellers permitted and there fore would consider it flawed. To this end TTCDP are not in a position to engage with a strategy which marginalises the very people it is meant to serve.

Once again at the LTACC on the 24th of September it was pointed out that there is still no Traveller representative on the higher level group within the interagency assembly, nor was it up for discussion why? It is crucial that lessons are learned from the past and it is vital that someone voices the Traveller view.

4) TTCDP Submission Homeless Policy

Tallaght Traveller CDP have concern in relation to policy or lack of policy when a family presenting as homeless and in crisis, find the consultation process leading to conflict. Thus staff feel intimidated and the parents or parent finding them selves barred from the homeless unit and in some cases incarcerated. This has the effect of leaving the family in limbo. Tallaght Traveller CDP would suggest that all staff are trained to work within a low threshold environment and in the interim an intermediary or mediation service be utilised and incorporated into policy where local authority staff feel they cannot work with a family.

Once again the statement from the Traveller Accommodation Unit in relation to the submission omits how, when and by whom this training will be delivered to staff. The TAU refers to staff safety being paramount using words such as Threatening, Abusive, or Violent behavior will not be tolerated. I need to reiterate the caliber of staff needed to be able to deal with homeless people and families that approach the Homeless Unit on a daily basis when they are in crisis .

5) TTCDP Submission Allocation of Accommodation

Choice Based Letting is an excellent initiative and for those who can read write and have access to a computer the sky is the limit. Unfortunately most of the Travellers on the housing list don't have these skills or access to a computer. Tallaght Traveller CDP would suggest initiatives are run in conjunction with all the voluntary housing agencies, C.I.Cs, Traveller CDPs, Libraries, where all the agencies could come together to design a programme that would enable Travellers to access the service in a more friendly way.

Unfortunately this has not been taken on board nor is there a mention as to how it might happen in the future. If the Draft TAP is defined by SMART principles why is there no initiative within it, dates time lines etc

6) TTCDP Submission Provision of Accommodation for single Travellers

Tallaght Travellers CDP is very concerned that the TAU has stated that it does not provide accommodation for single people. This is discriminating and is quite a substantial equality issue which TTCDP believe South Dublin County Council should be at the forefront of amending and developing policy to overcome this issue.

Do we know how many there are ? Would it be possible to set a target to house single persons over the span of the new programme.

There was no mention of this issue at the meeting of the LTACC on the 24th of September nor has it been addressed in the Draft TAP 2014-2018. If the TAP is created for the wellbeing of Travellers why is the local authority not listening to what Travellers in the locality are looking for.

7) TTCDP Submission Medical Priority Cases

Of the 180 people listed on the Medical Priority list 15 are Travellers. Most of who have spent between 3 & 7 years waiting on specific accommodation. Tallaght Travellers would look as a matter of priority that all these people are identified and included in the in TAP 2014 – 2018.

Again there is no provision for medical priority cases within the Draft TAP 2014-2018. This is an area SDCC has failed and needs priority and should have people identified and included within the TAP 2014-2018.

8) TTCDP Submission Budgets

Tallaght Traveller CDP is looking that all monies assigned from the Department Of Environment to South Dublin County Council for Traveller Accommodation be presented at the LTACC meetings. This should include Maintenance, Grant submissions, Capital projects and any other allocations from housing. This way all building programmes identified in the TAP will be measurable through SMART principles.

At the meeting of the LTACC on the 24th of September looking at the draft TAP 2014-2018 there was no mention to this recommendation. It would make sense if the current TAP 2014-2018 was governed by SMART principles that it would be coherent, transparent and be perceived to be in line with best practice with regard to financial accountability.

9) TTCDP Submission Caravan Loan Scheme

Is no longer in existence. However there is scope to research a new initiative which would see monies form rent allowance, which is allocated through the Department Of Social Protection used to secure Trailers for Families looking to reside in Residential Caravan Parks.

There is huge savings to be made. The House Hold Budget Scheme which is run by An Post on behalf of the Minister for Social Protection would be the ideal conduit for Families to source a loan for a trailer with the repayment been deducted at source. There would be no onus on the Local Authority to purchase the Trailer. Tallaght Traveller CDP would ask that this be included in the new TAP as a piece of work for the LTACC to do in conjunction with the Money Advise & Budgeting Service.

Also in conjunction with the Department of Social protection.

10)TTCDP Submission Caravan Grant Scheme

In accordance with Circular TAU 1/2000 the Department of Environment Heritage & Local Government may provide funding (usually 50% of costs) towards the provision of reasonably priced caravans where evidence is provided of an emergency situation i.e. fire damage. The Department will also consider funding disability grants for exceptional medical situations. If available the balance of funding will be assigned for this emergency through the budgetary provisions of the Traveller Accommodation Unit for the duration of the Programme.

The Council will take on the responsibility of sourcing the appropriate caravan/mobile home.

This scheme is still active.

11) TTCDP Submission Tenants Handbook & DVD

Currently the Housing Department of SDCC is developing a new Tenant hand book. Tallaght Traveller CDP would suggest that a DVD be made. Where all the relevant trades / jobs mentioned within the tenants hand book are displayed on DVD with a step by step guide which would be oral and visual and would aid those who cannot read or write. The hand book and

DVD should then become part of a Tenants Induction prior to signing a Tenancy Agreement. This could be done with all future tenants of South Dublin County Council.

TTCDP sees this as a very relevant piece of work which encourages tenants to take responsibility for their own homes and educates the tenant in how to tackle basic DIY projects. Unfortunately at the 1 TACC meeting on the 24th of September there was no reference to this to be part of TAP 2014-2018.

In Summary

- If the Draft T.A.P is as you state designed & informed by S.M.A.R.T Principles there is need for greater clarity and definition as to the mechanics / finer detail as to how the T.A.P will be delivered. Specific, Measurable, Achievable, Relevant and Time Bound
- Tallaght Traveller Community Development Project would like its submission to be placed within the T.A.P 2014-2018 in its entirety and un-edited which will give total clarity to all the relevant issues affecting Travellers in South County Dublin.
- Identifying all the Voluntary Housing Associations by name and having their full input as to the role they can play in T.A.P 2014-2018 with their experience and in their capacity would be very beneficial with the links they have with the local authority and community puts them in a better position to offering Solid Community Support Services and advice to our client group.
- In relation to the identification and location of the Residential Caravan Parks under the heading of New Developments Tallaght Traveller CDP had stressed the importance of keeping all new developments smaller reducing any site with 8 to 10 units, to be reduced to no more than 4. In order to facilitate better harmony among the families and encourage better maintenance of properties and ownership. Figures need to be adjusted in the DRAFT TAP to show same.
- In relation to Transient sites if the Local Authority is not in a position to facilitate such builds then state that and why it is not in a position to

develop such at this current time or remove it from the T.A.P altogether.

This current T.A.P 2014 - 2018 is the third of its kind and it is not acceptable the time lag of nine years from the start of the first T.A.P to date that there is no further progress on the matter.

- The Traveller Interagency Groups as raised in TTCDP submission but omitted in the DRAFT T.A.P 2014-2018. The higher level group within this collective does not have a Traveller representative on it and continues not to recognise the need for same.

This is in total contrast with its name of the group along with any documentation or policy which the local authorities release in relation to Social Inclusion and the relevance to all communities living within and as one community. I refer specifically to the Mayors introduction to Social Inclusion Week 2013 which launches on the 11th November 2013

Quote the Mayor "Social Inclusion is about creating a society where everyone experiences full and equal participation in all aspects of life and South County Dublin Council remains committed to sustaining and enhancing efforts to improve the quality of life of all residents in the County".

Tallaght Traveller CDP is calling on the County Manager for immediate action to create the relevant space within this group for Traveller representation otherwise as stated in the proposal it is

dysfunctional and socially exclusive of the community it is supposed to represent.

- Tallaght Traveller CDP is also disappointed in the wording used in the reply to its submission in relation to Homelessness. The Point TTCDP was trying to clarify was the crisis Families , Mums & Dads find themselves in when presenting to the Homeless Unit in **Dire crisis, it is not easy to be rational.**
- Choice Based Letting covered in original submission and above.
- Medical Priority means just that. Tallaght Traveller CDP insist that of the 180 people identified with MP Status within South County Dublin, 15 are Travellers all need to be identified within the T.A.P and catered for over the next four years. Most of these people are years to date waiting on urgent specific accommodation requirements. Tallaght Travellers CDP and Traveller community are asking why ?
- In relation to Budget allocated to Traveller Accommodation and Management.

The County Manager estimated for 2013 that only €472,600 for the Maintenance of Traveller accommodation units but yet there is €1,392,700 for Traveller Accommodation Management both of which were adopted.

Given that the National budget for Travellers has been reduced by 80% and looking at the distribution of both sums allocated by the local authority there seems to be a need for redistribution and a further need to prioritise what and where the money is spent.

If the TAU was integrated within the Housing Department it would serve to reduce overheads and standardise the housing lists.

- The Caravan loan scheme needs a new initiative between the Department of Social Protection and Local Authorities Nation wide to address this matter. It would be of benefit if South Dublin County Council was to take the lead here within the Interagency Group and pilot an initiative.
- Tenants Handbook as mentioned above this needs to be placed as an appendix within the new T.A.P

On behalf of Travellers in South County Dublin and the Board of Management of Tallaght Traveller Community Development Project. I hope that in the final re-edited T.A.P 2014-2018 which will be presented to the Council Chamber in December 2013 will in fact highlight our requests. If I can be of any assistance or you would like to discuss any of the above issues / recommendations please do not hesitate to contact me.

Yours sincerely



Mark Bradley

Coordinator

Tallaght Traveller Community Development Project



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C/O Director of Services,
Housing Department

14th November 2013,

RE: Traveller Accommodation Programme 2014-2018

Dear Sir/Madam,

Please see enclosed- Submission on behalf of Cena-Culturally Appropriate Home Ltd in relation to the Traveller Accommodation Programme 2014-2018.

We look forward to hearing from you in the future.

Kind Regards,

Bridgie Casey,
Secretary.



Cena is a Traveller led Voluntary Accommodation Association

**Submission on behalf of Cena-Culturally Appropriate Home Ltd
Traveller Accommodation Programme 2014-2018**

Introduction:

Cena- Culturally Appropriate Homes Limited welcomes the opportunity to make a submission into the fourth Traveller Accommodation Programme 2014-2018.

Cena- Culturally Appropriate Homes Limited is a Traveller led Voluntary Accommodation Association. The name Cena is the translation of the Cant term (Traveller Language) for home. The objectives of Cena are informed by the vision of an Ireland where all Travellers are accommodated in culturally appropriate accommodation that meets their needs and also fulfils Travellers right to a home within a sustainable community setting of their choice.

Cena was granted Approved Housing Body status in October 2013, under section six (miscellaneous provisions) act, 1992.

Background:

In 2010 the Irish Traveller Movement (ITM), funded by the Department of the Environment, commissioned a study to assess if the establishment of a Traveller led accommodation Association (TVAA) was a feasible option. The study was undertaken in the context where the delivery and management of Traveller accommodation was undermined by a host of problems such as planning barriers, the lack of effective delivery mechanisms, poor involvement of Travellers in the design and development of accommodation and racism.



Cena is a Traveller led Voluntary Accommodation Association

Cena's Proposed Pilot Schemes:-working in partnership

CENA proposes to initiate and complete two pilot building projects, to commence during the lifetime of the Traveller Accommodation Programme 2014-2018. One of these will be a group housing scheme in an urban area, the other a halting site development in a rural area. The pilots will be delivered via a partnership between CENA and the relevant local authority.

The aims of the pilot projects are to:

1. Develop and implement a full needs assessment and design process in consultation with residents.
 2. Complete the developments in a way that meets needs and aspirations of residents.
 3. Evaluate the process of needs assessment, design, development and partnership building involved.
 4. Make use of evaluation results to develop a model of good practice that can act as the basis for dissemination and extension to other local authority areas in subsequent years.
- Expression of interest from Local Authorities
 - Agreement reached on two participating authorities.
 - Negotiation of terms of reference of local authority/CENA partnership – to cover decision-making protocols, evaluation process, funding arrangements etc.
 - Consultation and needs assessment process
 - Design process.
 - Beginning of Build
 - Build Completion
 - *Onwards:* Joint use of evaluation results to develop and transfer the model.

We are asking local authorities to express an interest in participation in pilot projects. If you do have an interest in further discussions, with a view to participation, please tick one of the boxes below, and return to us by **April 2014 via email at- info@cena.ie**

We _____ (name of local authority) are interested in participating in:

CENA rural-based halting site pilot project ☐

CENA urban-based group housing pilot project ☐

Cena will be launching their website in January 2014, an invite will be sent to you nearer the time.



Cena is a Traveller led Voluntary Accommodation Association



IRISH TRAVELLER MOVEMENT



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The Senior Executive Officer
South Dublin Co. Council
Traveller Accommodation Unit
County Hall,
Tallaght Town Centre
Dublin 24

HOUSING DEPARTMENT

02 DEC 2013

27th November 2013

RE: Comments on South Dublin Co. Council DRAFT Traveller Accommodation Plan 2014 - 2018

Dear Sir,

Please find some comments below on your Draft Plan with recommendations regarding the areas that would address accommodation issues in South Dublin County Council.

From my reading of the SDCC draft TAP it is specific, measurable, achievable, realistic and timebound, but is it actually meeting the needs of Travellers in South County Dublin? I am attaching a copy of a template for use which we included in our submission and that has since been modified by Dublin City Council.

Application Process - there is no mention of how Travellers are to apply for housing, except that for standard housing they must apply under the allocation scheme for standard housing.

Recommendation: Your Draft TAP could be read by every Traveller in South Dublin and it would help them in understanding the process in which they need to follow to apply for Traveller accommodation.

Assessment of Need - Annual Count, housing assessment from April 2013 used only. Clearly identifies 96 units of accommodation to be delivered.

Plan: 78 new units to be built over 5 years
51 redevelopment of units and
9 infil developments

Recommendation: Link with Tallaght Traveller Development Group and Clondalkin Traveller CDP in identifying a clear Traveller Assessment of Need,

Irish Traveller Movement Ltd - CHY 1406
Company No. 294188

as it is understood that families did not or were not in a position to respond to the letter inviting them to apply for housing.

Meeting the distinct needs of Travellers - there is no mention of specific economic activity in which Travellers work in and usually have beside there area of accommodation such as horses, scrap etc. The TAP does say that the council supports a school project and the Yellow-Flag but does not acknowledge the ethnicity of Travellers and their nomadic nature. The school project and Yellow Flag are not specifically related to the accommodation need of Travellers and there are no links drawn to this in the TAP.

Recommendation: Include in the policy South Dublin's recognition of Travellers as an ethnic minority and that Travellers have their distinct cultural needs.

Management of Accommodation - Acknowledging that this hasn't worked to date the TAP plans to specifically prioritise this in a sub-group setting of the LTACC.

Provision of Training - The Irish Traveller Movement is concerned that the council will provide training for Travellers on their "other options" when it needs to be clear on how the needs of Travellers could be met. We welcome that the TAP state that the staff should have training on Traveller Culture. This is not stated as a specific action of when, where and how many staff.

Recommendation: That South Dublin County Council would hold training for the Staff that works with Travellers on cultural awareness.

Indigenous Clause - mentioned that there is one but the TAP does not state for how long a Traveller has to live in SDCC area and what it actually means. This needs to be linked into the application process.

Recommendation: Link this to the Section 5 of the Housing Act 2009 which states that anyone with a familial link has a right to make an application for housing.

LTACC - Mentions two sub-committees but not how representatives are nominated, appointed, how many of each, the number of meetings, the gender balance at the meetings, the period of appointment nor how Travellers are included in the meeting. There is mention of the Traveller Inter Agency Group but not how the LTACC lns directly with it. There is no mention of Housing Social Policy Committee and how the LTACC links with it. ITM recommends that a seat is kept on the LTACC for a member of the HSPC so that there can be direct feedback to the committee.

Recommendations: That when the new LTACC is established with new elected representatives the Irish Traveller Movement could facilitate a session on what is the LTACC, and the terms of reference.

Transient provision - Like the other three Dublin local authorities South Dublin County Council says transient provision is the responsibility of the metropolitan network to jointly examine the need for provision for transient sites. Travellers being a nomadic group travel from place to place for trade, religious or family reasons.

South Dublin County Council has historically had families travelling to the area for trade and family reasons.

Recommendation: Each local authority should set up a monitoring system of the number of families who pull in and pull out of sites or roadside in their local authority area, to identify the need. The reporting mechanism should include who the people are, how long they plan to stay, how long they stayed and the purpose of the stay. This would give the metropolitan network a clear picture of the transient need.

Tenancy agreement - There is no mention of the type of agreement whether it's an agreement or license a agreements available but does mention that the differential rent scheme is operated in SDCC.

Recommendation: SDCC would standardise all tenancies to a Tenancy Agreement.

Homelessness - Homeless Travellers will be referred to the homeless agency, no recognition of how difficult it is for Traveller families who have nowhere to go - being split up, the specific needs of Travellers and the long term options as there is no chance of having "unauthorised encampments".

Recommendation: That SDCC would discuss the homeless need at your LTACC and draw up a policy that would also link into the metropolitan network of authorities.

Emergency Accommodation - There is no mention of temporary or emergency accommodation being provided and how the local authority will deal with emergency situations other than they will prevent it through good management. There is no recognition that there is a transient nature to Travellers and that families may return from other local authority areas to spend a number of years in South Dublin.

Caravan loans suspended.

Recommendation: We recommend that SDCC would reinstate the caravan loans.

Costings: The Irish Traveller Movement congratulates SDCC in costing for the first year of the programme.

Recommendation: That the cost of subsequent years are included in your plan. The Minister of State for Housing Jan O'Sullivan has committed to raising the available budget for 2014 if there is proven need of Traveller Specific Accommodation. It is therefore of the utmost importance to prove the need for Traveller specific accommodation which you are committed to delivering in the duration of your Traveller Accommodation Plan.

I hope that these observations are of use to you and that you take on these recommendations.

Yours sincerely,

Colette Spears
National Traveller Accommodation Officer

Irish Traveller Movement Ltd - CHY 1406
Company No. 294188

Example: Objectives and Target Dates for Delivery of measures contained in this plan:-

Objectives	Commencement	Completion	Progress as at the 1 st July 2014	Barriers to Progress	Future actions to address the barriers	Budget and allocation	sought actual
1. Complete consultation in relation to formal allocation of five Traveller specific houses.	Already commenced	May 2014	4 Allocations completed – Houses to be handed over the 1 st July 2014				
2. Allocate standard housing to Travellers on an ongoing basis	Ongoing	Ongoing	Standard House Allocations 2014 5 allocations 2 further offers refused 2 transfers.				
* Projected Allocation over five year period: 1. 2014 – 10 2. 2015 – 15 3. 2016 – 20 4. 2017 – 15 5. 2018 – 15							
3. Commence design of 2 unit Traveller specific accommodation at ?	July 2015	December 2015	Appoint design team end October Submit planning April 2016				
4. Construction and allocation of 2 unit Traveller specific accommodation at ?	May 2016	December 2016	Construction to begin May 2016 Allocate 2 units January 2017 Ongoing				
5. Replace the existing transient halting site with a new site in alternative land in general area, subject to planning	September 2015	December 2016					
7. Identify a location for permanent halting site for families requesting same who are currently living at ??? halting site.	April 2015	September 2016	Ongoing				
8. Design and construct five group houses in ???	June 2016	December 2017	Site identified Appoint design team end October 2015 Submit planning April 2016				
9. Refurbishment of ??? halting site	September 2015	March 2016	Departmental approval to proceed tenders received. Onsite construction to begin October 2015				
12. Commence rental accommodation scheme to facilitate the provision of private rented accommodation for housing applicants including the Traveller community.	July 2014	Ongoing	Landlord Seminar held on the				
14. Formulate and deliver tenant training programme specific to the needs of Travellers	June 2015	Ongoing	Liaison between local authority and the local Traveller group in September 2015 to begin formulation				
15. Promotion of the Caravan loan scheme	Ongoing	Ongoing	Ongoing				

Submission from Councillor Gus O'Connell, Chairperson of the Local Traveller Accommodation Consultative Committee received via email on the 2nd December 2013.

Submission in relation to Draft Traveller Accommodation Programme 2014 – 2018.

1. Can full texts of various submissions be included in the appendix and not just an abbreviation?
2. Include 'formalised links between LTACC and Housing and Social Development SPC.
3. Include an annual review of the programme with report to the elected members.
4. Include a request that funding be sought on a rolling basis instead of on an annual basis.
5. Include an intention to expand the LTACC to include representatives from other bodies e.g. Homeless Agency, HSE.
6. Include a clearer definition on how Travellers can access all housing options.
7. Make reference to the specific context in which Travellers with special needs are to be prioritised (not just medical model but also the social model).

C.T.D.G
PROMOTING



**TRAVELLERS
RIGHTS.**

Clondalkin Travellers Development Group

Second Submission in respect of the published

Draft South Dublin Traveller Accommodation

Programme 2014-2018

Recommended Strategies for the successful delivery

of the South Dublin Traveller Accommodation

Programme 2014-2018

*Clondalkin Travellers Development Group,
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Clondalkin, Dublin 22. Telephone: 4575124, Fax: 4573904
Email: ctdg@eircom.net*

Introduction

Clondalkin Travellers Development Group (CTDG) was established in 1989 to address the needs of Travellers in the Clondalkin and surrounding areas. CTDG is a partnership between Travellers and settled people working from a community development approach which seeks to bring about change in society by challenging structures and policies that create inequalities. It is a rights based approach which values the distinct social, cultural and economic needs of Travellers as a nomadic group in Ireland.

CTDG is committed to working in partnership with South Dublin County Council, Tallaght Travellers Community Development Project, elected representatives and other key stakeholders to address the accommodation issues affecting Travellers and the delivery of Traveller specific accommodation in the county. CTDG has always had a very proactive role on the Local Traveller Accommodation Consultative Committee (LTACC) and continues to remain deeply committed to this work.

CTDG were invited by South Dublin County Council in accordance with the Housing (Traveller Accommodation) Act 1998 to make a submission with regard to the preparation of the new Traveller Accommodation Programme for the period 2014-2018. It was intended that this submission which addressed a number of key areas with subsequent recommendations would inform the development of the draft programme.

However, some of the specific detail of the various recommendations has not to date been included in the published draft programme. Therefore CTDG wishes to take this opportunity to make a resubmission during this, the public consultation phase of the development of the 2014-2018 Traveller Accommodation Programme.

CTDG wishes to acknowledge the two meetings that have already been convened of the Local Traveller Accommodation Consultative Committee (LTACC) to discuss and examine the draft programme. CTDG also wishes to acknowledge that significant progress was made to move forward many of the issues and concerns raised by Travellers and the Traveller representative groups at those meetings.

CTDG wishes to take this opportunity of once again referring to the recommendations contained in its original submission together with the key issues that have emerged during discussions at the two specially convened LTACC meetings to discuss and debate the programme.

This second submission is a continuation of CTDG's first submission and the two should be considered together.

1. Interagency Strategy

The Traveller Interagency Strategy forms “an integral part of the programme with reference to consultation, tenant participation and estate management”.

The issue that continues to emerge relates specifically to the absence of Traveller representation on the higher level interagency group. CTDG has long advocated that Travellers be included in this group and has raised the issue tirelessly. Travellers are not included nor are they allowed to participate in the group that makes decisions on how to develop and implement strategies that impact on Traveller's lives and communities.

At the LTACC meeting of 21.11.2013 there were intensive discussions on the issue and some progress was made in that the LTACC made a commitment to addressing it with the higher level group. It was acknowledged that while it was outside the power of the LTACC directly to make a decision to include Traveller representation on the group, the LTACC will be considering making recommendations on the issue to the higher level group to move forward the issue.

Please also refer to page 16 of the original submission made by CTDG.

2. Size of Developments

This issue relates specifically to the number of units proposed for each new development outlined in the proposed construction programme. It is felt by Traveller groups and Travellers themselves who participated in the meeting held on 21.11.2013 last that developments should not exceed five units as larger developments have not always worked in the past.

CTDG wishes to recommend that all proposed development happens in consultation with the LTACC, Traveller groups and families concerned. CTDG particularly wished to stress that the numbers of proposed units in total should not be reduced, merely the size of the particular development in a given location. All proposed construction should take place in the context of larger developments and in the context of building sustainable and viable communities which contain a number of small clusters of Traveller specific units of accommodation rather than large isolated developments that only contain Traveller specific accommodation.

CTDG also has concerns around the viability of some of the sites identified for future proposed construction particularly given that they were not realised in the last programme and are being rolled over to this new programme. CTDG is concerned about the proposed development at Rathcoole for example, given that it is a site that is quite isolated, is not part of a larger proposed development and has been the subject of some local opposition.

At the LTACC meeting on 21.11.2013 CTDG recommended that in the event of any proposed construction not going ahead that there is a mechanism to monitor this annually and that the programme as part of its policy will examine alternative strategies to address Traveller's accommodation needs during the lifetime of the programme.

CTDG acknowledges that very significant progress was achieved in the provision of accommodation in previous programmes. However ultimately there were just 18 new units constructed in the last four year programme. CTDG continues to be deeply concerned about the fact that any proposed construction may not materialise during the lifetime of this programme and also continues to be deeply concerned about the length of time those families have been on the waiting list for Traveller Specific Accommodation.

Please also refer to pages 7-10 of the original submission made by CTDG.

3. Inclusion of Approved Housing Bodies

As discussed and agreed at the specially convened LTACC meeting of 21.11.2013, the policy section of the programme needs to specifically state its absolute commitment to the involvement of the approved housing bodies in delivering the programme.

CTDG also recommends the inclusion of a specific commitment to addressing developing a strategy to progress accommodation provision in partnership with approved housing bodies particularly given their unique position regarding access to separate and independent funding streams.

4. Creating formal links with the Housing Strategic Planning Committee

To date there hasn't been any formal links with the Housing SPC and it was agreed at the LTACC meeting of 21.11.2013 following CTDG's suggestion to include in its policy statement the intention going forward to create these formal links.

CTDG wishes also to add that this already happens in practice in some local authorities around the country. The other three Dublin local authorities have adopted this policy as part of their Traveller Accommodation Programmes.

5. Financing and Provision of Caravan Loans

CTDG has already recommended addressing this issue in its original submission. This issue was discussed in significant detail and at great length at the LTACC meeting of 21.11.2013. CTDG acknowledges that SDCC provided a substantial number of loans to families in the past towards the purchase of trailers/caravans. SDCC reported that some 95% of those loans were not paid back. To date those monies have not been recouped or recovered by SDCC.

CTDG acknowledges the difficulty in addressing this issue and the fact that there currently isn't any legislative framework in place to recover loan repayments through social welfare payments given the completely voluntary nature of the Household Budget Scheme as a means of paying bills. The issue is being addressed nationally by local authorities in discussions with the Department and the ITM is addressing the issue through its Accommodation Policy Committee.

CTDG wishes to acknowledge that the LTACC did acknowledge that Travellers are finding it very difficult in some cases to maintain their current accommodation in halting sites and that alternative strategies to address the issue must be examined.

CTDG wishes to acknowledge that the programme will outline its commitment to addressing the issue going forward, addressing the issue of loans and arrears and recouping those loans and addressing strategies to provide alternatives for families trying to access finance for trailers/caravans.

Please also refer to page 14 of the original submission made by CTDG.

6. Alternative Accommodation Options

Accessing private rented accommodation remains one of the biggest challenges facing Travellers currently. While Travellers are waiting for Traveller Specific Accommodation to be provided they are almost entirely dependent on accessing private rented accommodation. This is proving to be more and more difficult for Travellers not least because of the shortage of suitably priced property available for private renting but also simply because they are Travellers and private landlords will not rent to them. CTDG made a number of recommendations on this issue and discussed it in significant detail in its first submission.

The LTACC and the programme needs to be continually cognisant of the reality affecting Travellers trying to access private rented accommodation while waiting for permanent accommodation to be delivered. CTDG wishes to put on record that there is a national housing crisis looming, there are ever increasing numbers of families becoming homeless and that Travellers will be impacted most of all because of the systemic racism and discrimination they face.

CTDG wishes to recommend that the programme reflects this issue for Travellers and that it is committed to developing strategies in partnership with other stakeholders to address the short to medium term accommodation requirements of Travellers while waiting for permanent accommodation to be delivered.

Travellers have reported to CTDG difficulties in accessing homeless services. CTDG wishes to recommend that a commitment to developing strategies to address the particular issues Travellers might face is included in the programme and that this is done in consultation with Traveller groups and Traveller representatives. CTDG acknowledges the increasing pressure on resources and the increasing strain on personnel trying to deliver homeless services however only when there is real understanding of Traveller culture and the particular difficulties Travellers face, will these challenges be overcome.

The issue was also raised at LTACC meetings of Travellers who are on the Traveller Specific Accommodation list only, being able to access and qualify for RAS as an accommodation option while waiting to be accommodated in Traveller Specific Accommodation. More clarity on this matter has since been provided by the Housing Department which does in practice eliminate this as an option for Travellers who are on the Traveller Specific Accommodation list only and not the Standard Housing list. That being said, RAS is still dependent on being successfully able to access and sustain private rented accommodation, which is obviously a challenge as already stated.

Please also refer to pages 12-13 and page 19 of the original submission made by CTDG.

7. Annual Review

CTDG wishes to strongly recommend an annual review of the programme specifically monitoring and evaluating the work of the programme, what has been achieved and not achieved and the challenges going forward. This is crucial if the programme is to be governed by the SMART principles but also it is crucial in terms of accountability and responsibility to Travellers.

CTDG also recommends that the programme includes specifically mechanisms that address accountability where elements of the programme are not implemented and that ultimately the County Manager and the Housing SPC is accountable for the delivery of the programme.

8. LTACC Membership

As discussed and agreed at the specially convened LTACC meeting of 21.11.2013 this section needs to refer to the process by which the members of the LTACC are elected and nominated and specifically to how Travellers are included in this process.

Acknowledgement needs to be made of the particularly inclusive nature of the sub-committees and that Travellers have themselves reported on how participatory these new structures have become. The draft programme while acknowledging the establishment of the sub-committee structure needs to specifically commit to it going forward and also include and refer to the sub-committee's terms of reference.

9. Policy

There were a number of issues explored that were considered to be policy matters in how the local authority and the housing department deliver the programme. Some of these have been referred to already in this document.

In addition to those, it was discussed at the LTACC meeting of 21.11.2013 that a more detailed policy statement was required on how medical priority cases are dealt with particularly in relation to SDCC's excellent record of adopting a social model of disability in supporting Travellers who require accessible accommodation remain living in halting sites if that is their choice. CTDG wishes to see this acknowledged going forward and be reflected in the policy statement of how the programme will be delivered.

CTDG also wishes to acknowledge the openness of the LTACC to examining difficult and challenging issues even if they have in the past been contentious. The LTACC has been very open to dialogue and change and examining new strategies and ways of doing business. The establishment of the sub-committee structure is one such development and the continued commitment to addressing ongoing issues like caravan loans, the participation of Travellers in the Interagency Strategy and so on. It helps and moves towards creating a culture of partnership and working together and which the TAU reflected on at the LTACC meeting of 21.11.2013. CTDG feels that this should be reflected in some more significant way in the programme's policy statement going forward.

CTDG wishes also to refer to the policy section of the draft programme in which it states:

It is the policy of the Council to provide group and standard housing options as well as residential caravan park bays, for the accommodation of Travellers who are indigenous to South Dublin, in accordance with the Assessment of Need carried out under the Act. In so providing the Council recognises Travellers' cultural identity as a minority group some of whom travel, and strives to accommodate Travellers in a culturally appropriate way catering for their social needs.

The 1998 Act does not specifically refer to only providing accommodation for Travellers who are indigenous to the local authority area concerned. In fact the term 'indigenous' is not used at all in the Act. Travellers are a nomadic community and it is acknowledged and recognised that they travel so this particular statement does need some revision. Section 6 of the 1998 Act refers specifically to Section 9 of the 1988 Act which states "subject to this section, a housing authority may, to such extent (if any) as the authority consider appropriate, include in an assessment under this section need arising from the requirements of persons who are residing outside the functional area of the authority."

The policy statement also only refers to Traveller's cultural identity in the context of the provision of residential caravan park bays. The policy statement needs to further expand on the cultural needs of Travellers in the wider accommodation context therefore fulfilling the statement "*strives to accommodate Travellers in a culturally appropriate way catering for their social needs*". The policy statement needs to define what those social needs are in the context of the provision of accommodation and needs to address issues such as nomadism, economic activities, growth of the extended family, horse ownership etc.

Conclusion

It is acknowledged that progress has been made on the delivery of accommodation in South County Dublin and in Clondalkin. CTDG welcome all of these developments and look forward to a situation where all Travellers in Clondalkin have good quality culturally appropriate accommodation matched by quality accommodation services that meet their needs. CTDG in partnership with all of the agencies will continue to work to tackle the barriers identified to make this vision a reality.

CTDG wishes to acknowledge in particular the commitment of the members of the LTACC, the commitment of the Housing Department of SDCC and in particular the commitment of staff of the Traveller Accommodation Unit. CTDG looks forward to working with the LTACC, SDCC, TTCDP and other stakeholders over the lifetime of the new programme.