

# Mid–Term Review of Traveller Accommodation Programme 2019-2024

Section 17(1)(a) Housing Traveller  
Accommodation) Act, 1998

4<sup>th</sup> November 2022

## 1. Introduction

The current Traveller Accommodation Programme (TAP) 2019-2024 was adopted by the Elected Members of South Dublin County Council on 8<sup>th</sup> July 2019. The programme was based on an assessment of the housing needs of Travellers residing in the County and a consultation process with key stakeholders.

The mid-term review examined the Council's approach to the provision of Traveller Accommodation over the lifetime of the programme in relation to:

- Filling of casual vacancies
- Refurbishment of existing units
- Standard Social Housing
- Construction/Redevelopment of new sites.

In July 2022, the Department of Housing Local Government and Heritage (DHLGH) directed all local authorities to undertake the statutorily required mid-term review of their current Traveller Accommodation Programme (TAP). The process for the mid-term review is a matter for each local authority, having regard to Section 21(3) of the 1998 Act, and the Local Traveller Accommodation Consultative Committee (LTACC) was central to the process in South Dublin. While there is no statutory requirement to publish newspaper notices prior to undertaking a mid-term review, the Council did so on 11<sup>th</sup> August 2022 inviting submissions from the public generally.

## 2. Review of the Traveller Accommodation Programme

### 2.1. Assessment of Need

The assessment of accommodation needs to inform the TAP, conducted in November 2018, identified the projected requirement for 108 Traveller households to be accommodated over the lifetime of the plan. The breakdown of the accommodation to be provided for the 108 households during the term of the programme was:

Standard Social Housing	53
Group Housing	30
Bays	25
<b>Total</b>	<b>108</b>

**Table 1: Projected Accommodation Needs (TAP 2019-2024)**

The assessment also identified a further 82 individual Travellers who will reach 18 years or over by the end of 2024 that could potentially result in future family formations requiring an additional 41 homes during the term of the programme.

## 2.2. Delivery

### 2.2.1. Standard Social Housing

As referred to above, the TAP identified projected provision of 53 standard social housing allocations to Traveller households. To date, a total of 34 standard social housing allocations have been recorded for Traveller households as follows:

Year	TAP Target	Allocated
2019	10	7
2020	10	13
2021	11	4
2022 (to date)	11	10
2023	11	
<b>Total</b>	<b>53</b>	<b>34</b>

**Table 2: Standard Social housing Allocations to Traveller Households**

This shows that 65% of the cumulative target for allocations in standard social housing to Traveller households has been met to date. It should also be noted that there is anecdotal evidence that additional Traveller households have accepted standard social housing but are not formally identified as such due to the lack of an ethic identifier for social housing applicants at the time of their original application for standard social housing.

### 2.2.2. Casual Vacancies

Casual vacancies arising in our current stock of Traveller accommodation during the lifetime of the programme are a key part of meeting the accommodation needs of Traveller households with 55 such vacancies projected to arise over the course of the current TAP. To date, a total of 19 allocations have been made in existing Traveller accommodation as follows:

Year	TAP Target	Allocated
2019	11	9
2020	11	4
2021	11	5
2022 (to date)	11	1
2023	11	
<b>Total</b>	<b>55</b>	<b>19</b>

**Table 3: Allocations to Casual Vacancies in Traveller Accommodation**

While this represents 34% of the cumulative target for allocations in Traveller accommodation casual vacancies, at the time of this review nine (9) additional Traveller accommodation units are vacant and undergoing refurbishment with offers of accommodation accepted for those units. These additional allocations will increase the allocated figure to 51% of the target.

### 2.2.3. Construction and Refurbishment Projects

The Council is committed to ensuring that permanent Traveller accommodation is located in close proximity to services including transport, education, community, schools, retail and amenities. We intend to achieve this through the development of new sites, the redevelopment of existing sites and through Part V delivery.

The Covid-19 pandemic has had a very significant impact of progress with planned projects in our TAP as site access was prohibited at many stages during the various lockdowns in 2020 and 201 while opportunities for the required consultation processes were also limited. However, during this period we did use online platforms for digital consultation with members of the Traveller community and their representatives, including with the engagement of CENA, a Traveller-led approved housing body, to somewhat mitigate the limitations of restricted in-person consultation.

The current status for each of the projects proposed in the TAP is:

Site	No. of Units /Households	Comment
Adamstown SDZ (4 sites)	24	6 units scheduled to be delivered in Q4 2022 with the balance to be delivered across 2024-25
Owendohar Haven	9	Plans for re-development of bays into group houses to go to local Area Committee in Q4 2022 followed by Part 8 public consultation process
Old Castle Park	18	Redevelopment of site in mix of houses/bays based on extensive consultation – design to ACM Q4 2022
Newcastle LAP	6	Indicative timeframe for delivery in 2024 through Part V
Rathcoole	10	Indicative timeframe for delivery in 2025 subject to revised masterplan for the site following the County Development Plan process
Fonthill	7	Part 8 approved in June 2022 for group housing to replace existing temporary accommodation with site works expected to start in Q4 2022
Lynch's Lane	10	Proposal to replace existing emergency 3-bay site is not proceeding at present.
Lock Road	6	Four households previously on site have been allocated standard social housing and proposals are being developed for a permanent, alternative development for the remaining families.
Whitestown Way	5	Following extensive consultation, the households on site declined an offer of permanent accommodation meeting their needs and preferences. Alternative accommodation options will now be explored.

**Table 4: Status of Traveller Accommodation Projects**

### 2.2.4. Provision of Caravans, Mobile Homes, and Medical Chalets

This Council volunteered to be one of the pilot local authorities for the new Caravan Loan Scheme launched by the Department of Housing, Local Government and Heritage in 2021. The scheme

provides an increased loan amount up to a maximum of €30,000 to assist Travellers to purchase of a mobile home/caravan for use as a primary residence with repayments based on household income and the loan period linked to the expected lifespan of the caravan/mobile home. The amount advanced for each caravan loan is fully recoupable by the Council from the DHLGH Traveller accommodation capital budget.

In addition, several mobile homes/caravans were provided to households under the COVID emergency fund from the DHLGH, and the Council continues to provide specially adapted medical chalets to households to meet specific medical needs.

Mobile homes/caravans provided to Traveller households in the County during the period of the TAP are shown in the following table:

Site Location for Caravans/Mobile Homes/Medical Chalets	Medical	Emergency / COVID	Caravan Loans	Totals
North of Naas Road: (Oldcastle Park, Kishogue, Lynch's Park)	4	5	6	15
South of Naas Road: (Belgard Park, Belgard Road, Hazel Hill, Owendoher, Stocking Hill, Cherryfield)	1	5	6	12
<b>Totals</b>	<b>5</b>	<b>10</b>	<b>12</b>	<b>27</b>

**Table 5: Provision of Caravans/Mobile Homes/Medical Chalets during current TAP**

### 3. Consultation with Key Stakeholders

#### 3.1. Local Traveller Consultative Committee (LTACC)

The LTACC plays a key consultative role relating to the provision and management of accommodation for Travellers, providing accountability and a mechanism for reporting back to Travel. A progress report on the TAP is a standing item on the agenda for each LTACC meeting which informed the committee's input and consideration of the mid-term review. During the lifetime of the current TAP, the committee has met a total of 19 times as follows:

Year	No. of LTACC Meetings
2019	4
2020	6
2021	5
2022	4
Total	19

**Table 6: Number of Meetings of LTACC 2019 to date**

#### 3.2. Consultation for Mid-Term Review of TAP

The Local Traveller Accommodation Consultative Committee (LTACC) and Local Traveller support groups were central to the mid-term review process, having been updated on an ongoing basis of all aspects of Traveller accommodation development, management and related matters. In addition, the Housing Strategic Policy Committee of the Council considered a detailed update on the process and provided its recommendation to the LTACC. The Council also invited submissions from local

Traveller support groups, local elected representatives and other interested stakeholders including those who made submissions in relation to the original TAP. In addition, the Council also published newspaper notices prior to undertaking the review on 11<sup>th</sup> August 2022 inviting submissions from the public generally. Seven formal submissions were received and considered as part of the mid-term review process.

### **3.3. Consultation for Traveller Accommodation Developments**

As plans are progressing for the redevelopment of the existing sites as outlined in the TAP, we have undertaken extensive engagement with the residents of those sites, individually and collectively, and through their representatives including Tallaght Travellers Community Development Project (TTCDP) and Clondalkin Traveller Development Group. In addition, with the endorsement of the LTACC, we have also engaged CENA: Culturally Appropriate Homes Limited, a Traveller-led approved housing body, to progress an innovative Traveller-centred consultation process to develop the proposals for the redevelopment of existing Traveller accommodation at Owendoher Haven in Ballyboden and Oldcastle Park in Clondalkin. This is in addition to the formal statutory public consultation process under Part VIII of the Planning and Development Regulations 2001 as amended which has been completed for Fonthill and which will commence later this year for Owendoher and Oldcastle Park.

### **4. Irish Human Rights and Equality Commission Equality Review**

In June 2019, the Irish Human Rights and Equality Commission invited local authorities to conduct an equality review on Traveller Specific accommodation in accordance with Section 32 (1) of the Irish Human Rights and Equality Commission Act 2014.

The Council is committed to ensuring that there is a culture of respect for human rights and equality among our staff and for the people to whom we provide services. A cross department working group has recently been established to drive implementation of our Public Sector Duty. The cross-department, cross-grade working group has carried out an assessment of the what human rights and equality issues are relevant to our functions and has identified the policies, plans and actions in place to address those issues in our [Public Sector Equality and Human Rights Duty Framework](#). The recommendations of the working group will significantly inform subsequent reviews of the current TAP and the development of the next TAP. The Senior Executive Officer with responsibility for Traveller Accommodation has been nominated as a member of this working group recognising the housing function as a service to which human rights and equality considerations are particularly essential.

As outlined above, the engagement of the Traveller-led approved housing body CENA to consult with existing residents of Traveller accommodation on the design and cultural appropriateness of plans for new and redeveloped Traveller accommodation demonstrates a new approach to consultation. We trust that this recognises and embraces the ethnicity of Travellers and maximises the ownership, input and full participation by Travellers in meaningful consultation mechanisms to deliver accommodation proposals reflecting their culture and ethnicity as well as being inclusive of the needs of all Travellers including people with a disability and older people. This consultation method is ongoing on the sites outlined earlier and is seeing design proposals emerging that are shaped by Traveller households' inputs, needs and preferences, signposting the way forward for future consultations with Traveller households on the design and development of Traveller accommodation.

## **5. COVID 19**

The Covid pandemic and associated restricted and lockdowns has significantly impacted on the timelines for delivery of the projects envisaged in our TAP programme. The process for design, consultation and construction of projects have effectively seen delays of up to two years with many projects not progressing as staff within our Traveller Accommodation Unit were diverted to dealing with emergency responses and supports for Traveller households. Staff worked closely with the LTACC, local Traveller support groups and other statutory and voluntary agencies to implement a range of measures and support to minimise the spread of COVID-19 and lessen the risk of infection particularly for Travellers living on halting sites within our administrative area. We collaborated with local Traveller support groups to deliver:

- Supply of caravans/mobile homes and portable sanitation units to facilitate isolation and alleviate overcrowding particularly for households with vulnerable persons
- Accelerated refurbishment programme for vacant Traveller accommodation to expediate allocations of accommodation to Traveller households in shared or temporary accommodation
- Prioritised emergency and urgent works including water, sanitary and heating maintenance responses for Traveller households in halting sites through the assignment of a dedicated maintenance manager
- A Traveller-specific COVID-19 communications initiative including a social media campaign for young Travellers
- Enhanced domestic waste collection services and cleansing programmes for halting sites
- Provision of fresh water for families without a water service
- Funding of hygiene and sanitation measures on sites

## **6. Office of the Planning Regulator**

In October 2021, the Office of the Planning Regulator (OPR) published a case study on “Traveller Accommodation and the Local Authority Development Plan”. This was prepared following a recommendation in the Traveller Accommodation Expert Review Group report which called upon the OPR to research and review "Traveller accommodation policies and objectives in statutory development plans." The case study was based on a survey of current development plans and Traveller accommodation programmes and examined linkages between their policies and objectives and sought to support planning authorities in the performance of their duties and to highlight best practice and promote shared learnings across the sector. It will inform and enhance consistency and linkages between future Traveller Accommodation Programmes and County Development Plans in South Dublin but does not necessitate any formal amendment to the current TAP.

## **7. Mid-Term Review Outcome**

A mid-term review report on the TAP was presented to the Council’s Housing Strategic Policy Committee in September 2022 outlining the following:

- updates on delivery of new and redeveloped Traveller accommodation
- numbers of Traveller households allocated standard social housing or casual vacancies on existing Traveller accommodation
- provision of caravans/mobile homes/medical chalets to Traveller households, and,
- acknowledgement and responses to issues raised in submissions where appropriate

That committee endorsed the mid-term review report finding that no formal amendment to the TAP was required was endorsed by the Council's Housing Strategic Policy Committee which recommended that position to the LTACC.

The TAP mid-term review report was then presented to the LTACC at its meeting in September 2022. Discussion at the meeting particularly highlighted issues relating to transient site provision, energy efficiency in Traveller accommodation and caravan/mobile home provision. Following detailed consideration of the report, and noting the Housing Strategic Policy Committee's recommendation, the LTACCC decided that **no formal amendment to the Traveller Accommodation Programme was required.**

Accordingly, this TAP mid-term review report provides formal notice by the Council to the Department of Housing, Local Government and Heritage of this position.



## **Appendix 1: Letter to Minister for Housing from South Dublin County Local Traveller Accommodation Consultative Committee**

Mr Darragh O'Brien, TD,  
Minister for Housing

Dear Minister O'Brien,

The South Dublin County Local Traveller Accommodation Consultative Committee has taken the opportunity provided by the midterm review of the Traveller Accommodation Programme to write to you personally outlining our concerns and proposals for change at this time.

In doing so we emphasise that it is generally acknowledged that South Dublin County Council has a reputation as one of the best local authorities in Traveller accommodation. However, we would contend, that the national programme itself has many built in flaws which have the effect of restricting the Local Authority. In turn, we believe this is but a reflection of how the Irish State (political and statutory) has treated the Traveller Community since the foundation of the State. We have failed to provide Traveller culturally specific accommodation and, in the process, alienated Travellers within Irish society. We believe that this is now a human rights issue and Travellers deserve an apology accompanied by affirmative action from the State.

This is borne out in the findings of reports such as the UN International Survey (2022) based on work with the Traveller and Roma communities across Belgium, France, Ireland, The Netherlands, Sweden and the UK. The survey shows that in the year before the survey, some 45% of Irish Travelers experienced discrimination when seeking accommodation, work, education etc. This is one of the highest in the Countries surveyed.

These findings contrast with that proposed in the National Traveller Roma Inclusion Strategy 2017-2021, under cultural identity, which clearly outlines that the state will support, promote and value Traveller culture, identity and heritage. For the vast amount of the Traveller community seasonal nomadism is a very important part of Traveller heritage and identity. The state has clearly accepted and acknowledged that it has a duty of care for the protection and promotion of Traveller traditions.

However, there is strong evidence to support the accusation that members of the Traveller community, who wish to live in Traveller specific accommodation, are being forced to accept settled or standard sedentary/settled accommodation. This is despite the official state recognition of Traveller ethnicity on March 1<sup>st</sup>, 2017, by An Taoiseach in Dáil Eireann. We believe that there needs to be a more proactive and affirmative policy at National level and across the Local Authorities regarding the promotion, protection, preservation and valuing of the Traveller community and their traditional ways of life.

The Tallaght Traveller Development Group have described better than we can the implications of not taking an affirmative and positive approach in working with Travellers: "nationally Local authorities have failed to provide Traveller specific accommodation in accordance with their own targets. The number of Traveller families living in private rented (owned by private landlords) accommodation has increased and the number of families living in Traveller specific accommodation has steadily decreased over the past decade. This is the result of Travellers being forced out of their nomadic way of life by a combination of a lack of Traveller specific accommodation and legislation which criminalizes (and otherwise renders impossible) nomadism in Ireland. Travellers have been forced to abandon nomadism. State-funded research establishes that failings on the part of local authorities, and not

changes in the way of life of Travellers, have driven down the number of families opting for Traveller specific accommodation.” The current work in exploring transient sites in the Dublin area is to be welcomed but there needs to be a Ministerial Order that all Local Authorities provide at least one Transient site each during the current plan and the Department must make urgent specific funds available for this purpose over the remaining lifetime of the 2019-2024 Plan.

We are all aware of the current increase in fuel prices and the pending possibility of rationing and further increases as we enter the winter period. Travellers, given the type of mobile home they can afford, are more vulnerable in this situation than are the settled population. Accordingly, there is a need to carry out a fuel efficiency assessment across all existing group housing schemes followed by a Departmental funded scheme to reduce fuel poverty amongst Traveller Families as a matter of extreme urgency.

We are also calling on you as the Minister responsible to take into account the increased inflation and the issues that Traveller Families face regards to food and fuel poverty, as some of the older Traveller halting sites have a centralised electricity supply and do not have an independent bill they therefore cannot avail of the Electricity Costs Emergency Benefit Scheme. As of 2021 we know Traveller families were spending €120 per week on electricity cards alone just to keep their home warm during the winter period, this excluded the cost for bottled gas for cooking purposes, and on many occasions this gas was used to also heat the home.

Many Traveller Families in our County are living in substandard accommodation. The recent (limited) caravan loan system is welcome and will work for some Traveller families. But we need to reflect on the 2018 study on Caravan Rental conducted by the National Traveller MABS, which states “...questions are raised as to whether or not a loan scheme is the most appropriate vehicle for the provision of good quality accommodation to Travellers who are largely in need of social housing and recommends exploration of alternative rental schemes.”

Many of the mobile homes that can be purchased under the current loan scheme are holiday type standard and not intended for year-round accommodation. Secondly, their lifespan is quite short and may need to be changed before the loan term expires. The report goes on “while rental might be more affordable and offer higher quality accommodation *than currently exists* (our italics) this does not negate the usefulness of a loan scheme for some families on higher incomes who would prefer to own rather than rent.” In terms of the current ‘Caravan Loan Scheme’ it finds that “amounts on offer are not sufficient to purchase and install a mobile home of sufficient quality and should be increased. However, increasing the loan amount has implications in terms of affordability and over-indebtedness for families undertaking a loan.” It is our contention that the current loan system needs to be brought into line with the reality of the market forces and 2022 mobile home standards.

This situation, to find a second hand mobile or apply for a loan, underlines a fundamental flaw in the national Traveller accommodation policy. Settled people in need of social housing are offered a home of standard sedentary/settled accommodation ready for use and pay a differential rent. Travelers who choose to live in culturally specific accommodation must provide their own home and pay a siting rent to the Local Authority. The case for a rental system is self-evident and should form an urgent part of the response to the midterm review of Traveller Accommodation Plans by the Department.

It follows and we are requesting you as the Minister responsible to have an evaluation of all Traveller Accommodation Plans carried out and adjusted to reflect and implement these objectives and that each Local Authority put in place systems and practices that support and promote Traveller heritage,

culture and identity as the central objective of their Traveller Accommodation Plan.

This Midterm Review of the TAP is, in reality, a review of a rolling programme that is based on the Traveller Accommodation Act of 1998. We have had a quarter of a century to get it right. However, the Irish Times report (22<sup>nd</sup> August 22) draws attention to the fact that the drawdown of funds for Traveller Accommodation from the Department by Local Authorities is way below the money set aside. There is empirical evidence that over that period some €72m of the allocated funds for Traveller Accommodation has not been drawn down by Local Authorities. Our experience as an LTACC tells us there is a need to identify the barriers that exist to a more responsive approach to Traveller Accommodation and that a more streamlined and efficient procedural and approval process for such funding, from the Department to individual Local Authorities, needs to be put in place as a matter of urgency if targets are to be met and if Travellers are to be facilitated with culturally related accommodation in accordance with their individual choice.

In recent years there has been a marked increase in the number of families sharing accommodation which leads to overcrowding in both halting sites and standard housing. Travellers have been one of the groups most affected by the housing crisis with a huge increase in the number of Traveller Families in rented, or emergency, accommodation. Collectively, this amounts to a National Crises. We are calling on you as the Minister responsible to initiate immediately an urgent National Traveller Accommodation Plan to be delivered by Local Authorities that will bring individual Local Authority Traveller Accommodation Plans into line with the delivery of culturally based Traveller accommodation at acceptable standards by the end of the current 2019-2024 Plan.

Yours faithfully,

**Councillor Guss O'Connell**

**Chairperson**

**On behalf of the South Dublin County Council Local Traveller Accommodation Consultative Committee.**