

Draft Traveller Accommodation Programme





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Introduction

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

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

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

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



Equality and Human Rights

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

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

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

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



Image: Owendoher

County Profile

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

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

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

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

Existing Traveller Accommodation

Staff from the Traveller Accommodation Unit conducted a survey in November 2023 and ascertained that there are currently 226 families living in Traveller specific accommodation within South Dublin County. The breakdown of this accommodation is outlined in the table below and locations are spread across the County as outlined in the associated map.

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

^{*}Total of 114 Households in Bays/Group Housing

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

^{*119} Households in Traveller Specific Housing



Emergency/Temporary Sites Locations	Bays	Sharing
Lock Road	5	0
Whitestown Way	2	2
Total	*7	*2

^{*8} Households in Emergency/Temporary Sites

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

OVERALL ASSESSMENT SUMMARY

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

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

Accommodation Type	Target	Delivery
Standard Social Housing	53	62
Group Housing	30	23
Bays	25	18
Total	108	103

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

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

NEW TRAVELLER SPECIFIC ACCOMMODATION DELIVERED DURING THE TAP 2019-2024

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

REFURBISHED / UPGRADED ACCOMMODATION DELIVERED DURING THE TAP 2019—2024

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

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

ENERGY EFFICIENCY RETROFIT PROGRAMME (EERP) PILOT SCHEME

Energy poverty is widely experienced within the Traveller Community. Under the EERP, the Council afforded the opportunity to all 14 tenants in Old Castle Drive of which 9 accepted to upgrade their homes. The upgrade included the installation of air to water heat pumps and windows and doors replacement throughout the property. Attic and cavity wall insulation (where required) were also installed to bring the properties up to a BER B2 rating or cost optimal.

The Council is committed to extending this pilot to provide more energy efficient housing options to Travellers in both our newly constructed homes and existing housing stock over the lifetime of the next TAP 2025-2029.

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



Traveller Accommodation Programme 2025 - 2029

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

Assessment Of Need

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

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

^{*}Estimated Figure

The assessment for the preparation of the TAP in February 2024 showed that there are a total of 241 families residing in Traveller specific accommodation in the County. Among these, 193 households have permanent accommodation, while 8 families are housed in temporary/emergency halting sites. Additionally, 33 families are currently sharing accommodation, and 15 families are residing unauthorised on sites. Notably, no households are living on the roadside. Furthermore, the assessment identified that there are 93 individuals over 18 years of age living with their families in Traveller specific accommodation within family units and 30 individuals who will reach the age of 18 years of age on or before the end of 2029. This demographic profile suggests a potential need for additional 62 Traveller specific accommodation units to accommodate future family formations.

It is imperative that the Council's priority remains focused on providing homes for households currently residing in emergency or shared accommodation. While acknowledging the potential need for additional units in the future, immediate attention must be given to addressing the housing needs of those Traveller households. This approach ensures that resources are allocated effectively to support those most in need within the Traveller community. Households not included in the Housing Needs Assessment carried out in March 2024 but who are eligible for social housing support may make an application for Traveller specific housing or social housing and it will be considered in accordance with the Council's Allocations scheme.

Traveller Ethnic Identifier

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

Assessment Of Future Accommodation Needs

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

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

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

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

Policy Statement

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

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

To implement this programme the Council will work with Travellers in need of housing, Clondalkin and Tallaght Traveller Development Groups, the Local Traveller Accommodation Consultative Committee, adjoining local authorities and national organisations. The Council will continue to provide on-site services to Travellers, including cleaning, maintenance of sites and will provide mobile caretaker services. Eligibility for Traveller specific accommodation will be in accordance with the criteria eligible for social housing support within the South Dublin County Council's administrative area. Assistance with applications for housing will continue to be made available to Travellers wishing to avail of standard social housing, voluntary housing and Housing Assistance Payment (HAP) and the Rental Accommodation Scheme (RAS).







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

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





Strategy Statement

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

Casual vacancies on Traveller specific sites

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

Refurbish and extend existing dwellings

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

Redevelop existing group housing and bay sites

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

Standard social housing and social housing supports

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

Construct new Traveller specific homes

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

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

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

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

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

South Dublin County Development Plan 2022-2028

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

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

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

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

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

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

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

Map Of Existing And Proposed Sites For Traveller Accommodation 2025-2029



Projected Targets And Implementation 2025-2029

Casual Vacancies

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

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

New Sites

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

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

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

- Brittas
- Bustyhill
- Steeltown
- Windmill/Blackchurch

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

Construction And Refurbishment Programme On Existing Sites

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

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

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

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



Redevelopment Of Sites At Design/Planning Stage

Location	No. of Units	Electoral Area	Status
Owendoher Haven	9	Rathfarnham/Templeogue	179A - Planning Exemption
Old Castle Park	20	Clondalkin	179A - Planning Exemption
Kishogue Park	k 15 Lucan 179A - Planning Exemption		179A - Planning Exemption
Total	44		

Other Sites Under Consideration For Re-Development

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

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

Standard Local Authority Housing/Approved Housing Bodies

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

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

Image: Redeveloped Kishogue Park

Transient Sites

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

The Council has proactively engaged with members of the Traveller community within its functional area through various initiatives, including an assessment of need conducted in March 2024 and focus groups held before the publication of the draft Traveller Accommodation Programme. These efforts aimed to ascertain genuine preferences regarding transient halting sites and outline actions to be undertaken based on such engagement. In line with its commitment to consult with the Traveller community and relevant stakeholders, the Council is in the process of appointing a dedicated Traveller Liaison Officer to engage with the Traveller community on relevant matters, including the provision of a transient site in the County.

The Council recognises the importance of collaborating with other Local Authorities for a coordinated approach to the provision of transient sites in the Dublin region. It will also cooperate with national bodies, including the Traveller Programme Board and the Department of Housing, Local Government and Heritage with regards to exploring the approach to the provision of a network of transient sites at regional and national level. The assessment of housing need conducted in March 2024 revealed a lack of clear preference among Travellers residing in South Dublin regarding transient sites. Focus group participants emphasised the need for more culturally appropriate housing options, including transient sites, to provide greater choice while recognising potential issues such as feuds and conflicts which may arise. Effective management and maintenance of transient sites are deemed critical to mitigate such challenges with a necessity for a transient facility to be structured and well-managed to address these concerns.

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

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

Temporary / Emergency Sites

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

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

Unauthorised Sites

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

Homelessness

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

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

Universal Access

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

Age Friendly Accommodation

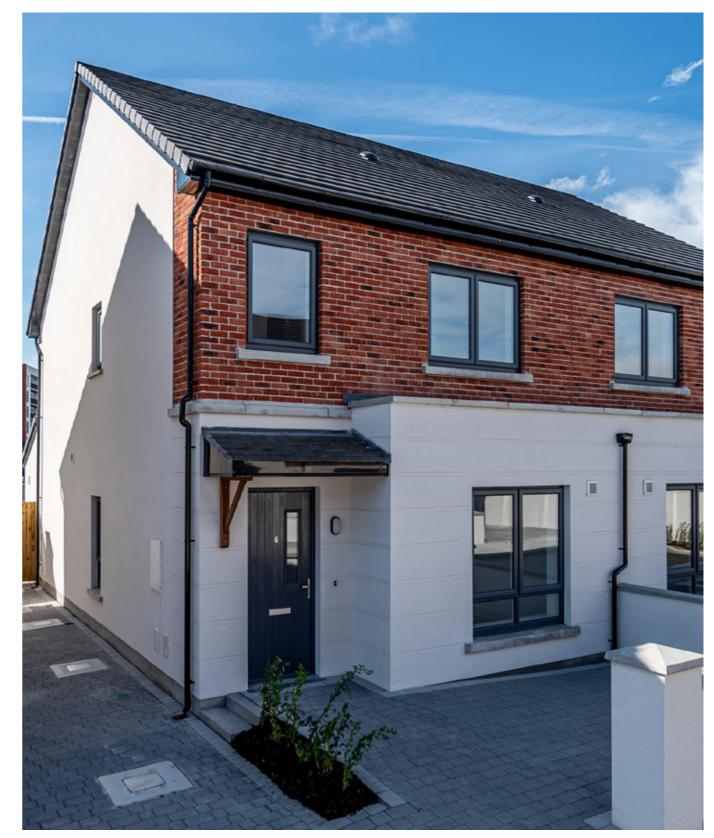
It is proposed to include the provision of housing specifically designed/ adapted for older members of the Traveller community within the duration of this TAP. While it is noted that the life expectancy of Travellers is generally lower, there is an observable increase in the age profiles with some older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

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

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

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

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



Caravan Loans

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

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

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



Summary

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

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

Standard Social Housing	63
Group Housing	77
Bays	6
Total	146

Management And Maintenance Of Developments

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

Pre-let Repairs

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

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



Maintenance And Repair Service

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

Anti-Social Behaviour

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

Fire Safety

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

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

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

Tenant Participation And Estate Management

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

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

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

Traveller Accommodation Unit

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

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

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

Local Traveller Accommodation Consultative Committee (LTACC)

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

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

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

Consultation

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

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

Quick Wins/Short-Term Solutions

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

Longer - Term Recommendations

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

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

Review Of The Traveller Accommodation Programme 2025-2029

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

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

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





Appendix A | LTACC Membership

Sean Logue - Senior Social Worker, Housing

Membership - Local Traveller Accommodation Consultative Committee

Cllr. William Carey

Cllr. Vicki Casserly

Cllr. Mick Duff

Cllr. Alan Edge

Cllr. Jess Spears

Cllr. Teresa Costello

Emily Smartt - Clondalkin Travellers Community Development Group

Sarah Jane (Jean) O'Brien - Clondalkin Traveller Community Development Group

Patrick Nevin - Tallaght Travellers Community Development Group

Mary Cassidy - Tallaght Travellers Community Development Group

Elaine Leech - Acting Director of Services, Housing

Fiona Hendley - Acting Senior Executive Officer, Traveller Accommodation Unit

Niamh Carton - Administrative Officer, Traveller Accommodation Unit

Steven Masterson - Senior Staff Officer, Traveller Accommodation Unit

Appendix B | Submissions

Submissions received between 1st July and 30th August 2024

1	Cena Culturally Appropriate Homes	
2	Clondalkin Traveller Development Group	
3	Tallaght Traveller Development Group	
4	Dun Laoghaire Rathdown County Council	



1 Cena Culturally Appropriate Homes



Submission to the Draft Traveller Accommodation Programme in South Dublin County 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 way. This Cena-led partnership can also be specified as an approach to addressing particular accommodation challenges identified in your Traveller Accommodaion Programme.

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

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

2 Clondalkin Traveller Development Group

Submission to the Draft Traveller Accommodation Programme in South Dublin County Council

Provision of Culturally Appropriate Housing

Within the Draft TAP much emphasis is placed on the provision of culturally appropriate housing.

The term 'culturally appropriate housing' needs to be defined to the satisfaction of all key stakeholders.

Culturally Travellers have traded in scrap metal and kept horses. Traveller culture is that of families living together in 'clans'. Therefore, if culturally appropriate accommodation is to be provided by SDCP the LA needs to engage with Travellers and representative organisations in a meaningful manner to, in as far as is possible, meet the distinct cultural needs of Travellers including keeping horses, living in family groupings and space for developing trades. With the new developments in Kishogue and Oldcastle SDCC engagement with families in relation to their needs, involved limited choices for families which amounted to a choice of type of housing unit i.e. bay, single or double story homes. There is limited space around the proposed new units and there is no forward planning for the expansion of existing families in terms of leaving space for young couples to be accommodated close to family members. CTDG would argue that this is not culturally appropriate housing.

RE the allocation of 7 homes in Shackleton in Adamstown:

CTDG would like to make the following observations

The Traveller Act 1998. (Sections 21& 22 of the Housing (Traveller Accommodation) Act 1998 require that each Local Authority to have a Local Traveller Accommodation Consultative Committee (LTACC) to advise on the provision and management of accommodation.) The development of the 7 units in Shackleton was presented to the LTACC when SDCC were seeking expression of interest from Traveller families in a 'Choice Based Letting' offering there was no consultation with the LTACC prior to SDCC informing the LTACC of the call for applications under the Choice Based Letting scheme.

There was also a request made at the LTACC that the allocation of homes in Shackleton be reviewed in terms of the number of families who applied under the scheme and also the reasons that many families would not consider applying for homes in the Shackleton development (CTDG was informed by a number of families that they would not apply as they were unsure of who they would be housed close to). To the best of our knowledge this request was not followed up by the SDCC.

Travellers and standard accommodation

Within the Draft TAP SDCC focus on the number of families applying for standard accommodation – from talking with Traveller families their belief is that there will be no further development of Traveller specific accommodation (only replacement of existing sites) resulting in their only choice being to apply for standard accommodation.

Transient Sites

The assessment of need which SDCP undertook in 2024, and which is referenced in the Draft TAP stated that there was a lack of preference among Travellers residing in South Dublin regarding transient sites. In the 'Connect the Dots' research undertaken on behalf of SDCC, Travellers themselves expressed 'frustration over the lack of progress on promises for transient accommodation and culturally appropriate housing made in previous plans.' Page 9 We believe that the way the question was worded by SDCC may have led to the response that there was no demand for transient sites.

Caravan Loan/Caravan Rental Scheme

CTDG believes that Traveller Accommodation should be provided to families living on sites and that there should be no need for the caravan loan scheme. We acknowledge that this is aspirational and to be worked towards in the meantime CTDG recommends that SDCC:

- 1. Engages with DHLGH and seeks an increase in the finance available under the Caravan Loan scheme to a level which will enable families to purchase residential caravans suitable for year round living which conforms to BS 3626.2015 and are better insulated and more fuel efficient than holiday homes which the current caravan loan scheme facilitates.
- 2. Initiate a caravan rental scheme for families who wish to avail of such an option or who cannot afford to purchase a caravan.

Age Friendly Accommodation

As part of the Draft TAP, SDCP are proposing the option of introducing 'Age Friendly' accommodation for older members of the Traveller Community – as noted earlier Traveller families like to live in close proximity – CTDG recommends that an extensive consultation with the community be undertaken prior to any such recommendation being acted upon as anecdotal evidence suggests that this would not be an appropriate response to accommodation for older members of the Traveller community.

Monitoring and Evaluation

CTDG recommends that the TAP 2025 - 2029 include SMART KPI's otherwise there is the danger that it will remain aspirational and not implemented.

3 Tallaght Traveller Development Group

Submission to the Draft Traveller Accommodation Programme in South Dublin County Council

- A login system for maintenance via the Traveller Accommodation Unit for Group housing as well as halting sites. It needs to be reinstated through the TALL
- Validation of Traveller Cultural Traits and traditions.
- Caravan Rental Scheme need to be implemented rather than a loan scheme. Lifespan of Trailers recognised as 5 years particularly for large families. Therefore, they need to be replaced every 5 years.
- Stocking Hill needs to be protected as Traveller specific accommodation.
- Belgard Park needs total refurbishment into Group Housing
- Hazel Hill needs to follow the plan set by O'Cualann Cohousing Alliance and Smith and Kennedy Architects https://www.smithkennedy.ie/
- Pilot project Cherryfield day units need upgrading and refurbishment. The estate would benefit with wrap-around services to ensure the success and template for other Traveller specific accommodation.
- Proposing an independent chairperson rather than a councillor, Traveller Rep. If not, a Traveller representative could be the chairperson. There is nothing in the legislation to state that it must be a local representative
- Councillors sitting on the LTACC need also to be sitting on the Strategic Housing Policy Committee
- Each Traveller project should have two permanent representatives, and a substitute named in case one of the permanent representatives cannot make it.
- Wrap around supports for Traveller families
- Provide the option of One-Off Standard Housing for Traveller families with accommodation needs
- Employment/training/apprenticeship with support for education and qualifications for Travellers while they work in SDCC. When advertising positions be inclusive of Travellers who might not have the educational qualification, but provide training and supports within the job.
- Transient halting sites to be provided within the local authority area.
- Example of template needed for the Traveller Accommodation Plan

Location	Action	Timeframe	Budget	Outcome
Stocking Hill	Feasibility study Draft Plan in consultation with the residents Go to planning if needed and tendering process Start renovations etc	When	How much	Design a plan of action Agreed plan Outcome or why it was not achieved 10 families living in safe secure culturally appropriate
Hazel Hill	As above			
Belgard Park	As above			
Cherryfield				
Maculliam				

Dún Laoghaire Rathdown County Council

Submission to the Draft Traveller Accommodation Programme in South Dublin County Council

Dear Sir/Madam,

Please see below Submission to the Draft Traveller Accommodation Programme in South Dublin County Council.

I refer to South Dublin County Council's draft Traveller Accommodation Programme 2025-2029, and statement regarding the provision of transient sites. Dún Laoghaire Rathdown County Council Traveller Accommodation Unit supports the statement that transient sites will not be considered unless there is a consensus amongst Travellers for such sites coupled with the development of a national policy on their location, management, and control. Dún Laoghaire Rathdown County Council Traveller Accommodation Unit supports a regional and collaborative approach on the provision of transient sites between the four Dublin local authorities.

