

# Traveller Accommodation Plan 2025-2029

Longford County Council

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## Executive Summary

County Longford is relatively small and bordered by County Westmeath, Cavan, Leitrim and Roscommon. Census 2022 shows that the population of Longford grew by 14% to 46,751, which means the number of people in the county rose by 5,878 between April 2016 and April 2022. This was the highest increase in population seen across the country.

There were 32,949 Travellers in Ireland, compared with 30,987 in 2016 (+6%). This included 16,777 females and 16,172 males. There were 913 Travellers in Longford in Census 2022, compared with 1,046 in 2016 (-13%). This included 461 females and 452 males.

In the 10 years since the 2011 Census, Longford's Traveller population has increased by 21.25%

Irish Travellers make up less than 1% of the population nationally, however, in Longford, the percentage of the population who are Irish Travellers is 1.95%, almost double the national average.

There were 29,900 Irish Travellers living in private households in Census 2022. The majority lived in permanent housing, while 2,286 people lived in temporary housing units such as caravans and mobile homes.

The proportion of Irish Travellers living in private households who were living in caravans, mobile homes or other temporary accommodation was 8% in 2022, down from 12% in 2016.

In Longford 784 (98.4%) reported living in private permanent households, while 13 (1.6%) reported living in temporary private households.

The average size of Traveller households was 4.27 persons per household in Co. Longford.

The overall health of Travellers is of relevance when determining accommodation needs. Census 2022 shows that 26% of the Traveller population report experiencing at least one long-lasting condition or difficulty compared to 22% of the total population.

1350 Travellers reported their general health as bad or very bad, 4% of the Traveller population, compared to 2% of the total population.

# Section 1 INTRODUCTION

## 1.1 Legislative and Policy Background

Longford County Council is required under the Housing (Traveller Accommodation) Act 1998 to prepare the next 5-year Traveller Accommodation Programme (TAP) 2025-2029.

The new Programme will replace the current 2019-2024 Traveller Accommodation Programme which expires on 31st December 2024.

Part II of the Act deals with the Traveller Accommodation Programme, and provides that:

- Local authorities will assess the accommodation needs of Travellers in their functional area (section 6).
- Local authorities will adopt an accommodation programme by a date specified by the Minister (section 7) for a five-year period, and which will provide for a range of accommodation to meet the identified needs (section 10).
- Section 16 deals with the steps the authority needs to undertake to implement the programme.
- Each programme should be reviewed in each three-year period or at such time as directed by the Minister (section 17). Local authorities can amend the accommodation programme, at its own initiative or on the direction of the Minister (section 18).
- The Minister shall appoint a National Traveller Accommodation Consultative Committee (NTACC), whose purpose is to advise the Minister on improving the participation of Travellers in the provision of accommodation as well as general matters relating to the accommodation programmes (section 19). The NTACC shall consist of not more than 12 members (section 20) and the term of office of a member shall not exceed 3 years.
- Local authorities shall appoint Local Traveller Accommodation Consultative Committees (LTACCs) (section 21), to advise on the provision and management of Traveller accommodation. The Minister may issue directions in relation to the composition, terms of references and support for the LTACC. Members and officials of the authority will not exceed half of the members of the LTACC and

representatives of Traveller organisations will not be less than one quarter of the membership.

On 18th December 2023 Mr. Kieran O’ Donnell, T.D., Minister of State for Planning and Local Government issued Circular Housing 46/2023 directing housing authorities to commence preparation of the next 5-year Traveller Accommodation Programmes (TAPS) for adoption by 31st December 2024.

## 1.2 Initiating the process for the preparation of the new Programme

The notification of intention to prepare a Draft Traveller Accommodation Programme issued on 1st February 2024 to adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Accommodation Consultative Committee and other local representative groups, community and interest groups. 4 submissions representing 6 organisations were received in response to the notification, all of which have been considered in the preparation of the Draft Programme.

## 1.3 Local Traveller Accommodation Consultative Committee (LTACC)

Under the provisions of Section 21 and 22 of the Housing (Traveller Accommodation) 1998 Act, a *Local Traveller Accommodation Consultative Committee* has been established to facilitate consultation between the Local Authority and the Local Traveller community. The Committee meets quarterly to advise Longford County Council on the provision and management of accommodation of Travellers.

Membership of the Longford Local Traveller Consultative Committee comprises of five Traveller representatives, six elected members and five County Council officials.

The LTACC plays an active and pivotal role in preparing and implementing the Traveller Accommodation Programme.

## 1.4 Traveller Accommodation Programmes

Over the lifetime of the last two Traveller Accommodation programmes (10 years), Longford County Council has delivered **261 units** of accommodation across the various forms of housing support.

The TAP 2019 -2024 provided for the delivery of a total of **108 units** of accommodation for Travellers over the five years. **153 units** were delivered during this period. Delivery was exceeded via several social housing options including the allocation of tenancies in Standard Local Authority Housing, Traveller Specific Housing, Rental Accommodation Scheme (RAS), Social Housing Leasing Initiative (SHLI), Housing Assistance Payment (HAP) and the allocation of tenancies in accommodation provided by the Approved Housing Bodies (AHBs).

**Table 1: Accommodation delivered under TAP 2019-2024**

| <b><i>Outputs Achieved</i></b>                  | <b>Year 1<br/>2019-<br/>2020</b> | <b>Year 2<br/>2020-<br/>2021</b> | <b>Year 3<br/>2021-<br/>2022</b> | <b>Year 4<br/>2022-<br/>2023</b> | <b>Year 5<br/>2023-<br/>2024</b> | <b>TOTAL<br/>Outputs<br/>2019-<br/>2024</b> |
|---|----------------------------------|----------------------------------|----------------------------------|----------------------------------|----------------------------------|---|
| TRANSIENT                                       | 0                                | 0                                | 0                                | 0                                | 0                                | <b>0</b>                                    |
| PERMANENT<br>HALTING SITE<br>2 OCCUPIED<br>BAYS | 0                                | 0                                | 0                                | 0                                | 0                                | <b>0</b>                                    |
| STANDARD LA<br>HOUSING                          | 13                               | 32                               | 18                               | 10                               | 11                               | <b>84</b>                                   |
| HAP   | 2                                | 2                                | 7                                | 2                                | 2                                | <b>15</b>                                   |
| RAS/LEASING                                     | 3                                | 14                               | 14                               | 11                               | 1                                | <b>43</b>                                   |
| VOLUNTARY<br>HOUSING<br>BODIES<br>(AHBS)        | 0                                | 5                                | 3                                | 1                                | 2                                | <b>11</b>                                   |
| TRAVELLER<br>SPECIFIC<br>GROUP<br>HOUSING       | 0                                | 0                                | 0                                | 0                                | 0                                | <b>0</b>                                    |
| <b>TOTAL</b>                                    | <b>18</b>                        | <b>53</b>                        | <b>42</b>                        | <b>24</b>                        | <b>14</b>                        | <b>153</b>                                  |

A proposal for a small group scheme development of 2 units is now at an advanced stage and a funding application is pending. This is subject to ongoing consultation with the Travelling community and the LTACC.

Although no group scheme units were achieved during the lifetime of the plan, it is notable that 5 units of standard LA housing were delivered with Traveller-

specific capital provision funding totaling €1,153,494 between 2021 and 2023. Longford County Council made a case for funding to acquire these properties as exceptional instances. This included the provision of a clearly identified need, along with outlining what alternatives were considered and why these were deemed unacceptable. Properties acquired with Traveller-specific capital funding must be designated as Traveller-specific accommodation and retained as such.

## Section 2 POLICY STATEMENT

Longford County Council's policy is set out in the Longford County Development Plan 2021-2027 Section 4.13.6 as follows:

*The Longford County Council Traveller Accommodation Programme (TAP) 2019-2024 fulfils requirements under the Housing (Traveller Accommodation) Act 1998. The TAP aims to meet the accommodation needs of Travellers in Longford within a five-year period up to 2024 whilst recognising the ethnic identity of the Traveller community and aiming to provide accommodation that is suitable to their specific needs. The TAP provides for standard housing options, as well as traveller-specific accommodation such as halting sites, temporary/emergency sites and one-off rural houses within County Longford. Different housing options will be provided in accordance with an assessment of need and are subject to feasibility.*

### 2.1 Provision of Accommodation

Longford County Council recognises Travellers as a distinct ethnic group with a unique heritage and culture. It is the policy of Longford County Council to provide suitable accommodation for Traveller households in its administrative area, per the Assessment of Need carried out under the Act, in compliance with the laws of the State.

Applicants for social housing support, including Traveller specific accommodation are required to submit a valid housing application together with all required documentation in accordance with the Social Housing Assessment Regulations, 2011 as amended. Advice and assistance will be provided to applicants, if requested, to address any difficulties that may arise in completing the application form. Specific family circumstances e.g.



disabilities will be considered in determining the most appropriate social housing solution.

The full range of social housing supports available will be used to achieve optimum accommodation solutions for Travellers included in the Programme approved for permanent accommodation including:

- Standard Social Housing
- Group Housing
- Units provided by an Approved Housing Body
- Rental Accommodation Scheme (RAS)
- Housing Assistance Payment (HAP)
- Rebuilding Ireland Home Loan Scheme

When allocating properties Longford County Council will have regard to the provisions of the Longford County Council Social Housing Allocation Scheme 2016, which sets out the basis for allocation of social housing support to qualified households. Separate waiting lists will not operate for the Travelling community and all qualified applicants for an area of choice will be considered, when a property arises, considering the following:

- Applicant type
- Qualification Category
- Length of time on Housing Waiting List
- Previous Offers made (if applicable)
- Previous Tenancy (if applicable)
- Requirement for housing on Medical/Disability grounds
- Estate Management
- Consideration of applicant and community profile factors
- Status of Current Tenancy – HAP, RAS, NTQ
- Tenancy Sustainment – Requirement for support

As per Section 2C of Longford County Council's Allocation Scheme, the following priorities shall apply in the order as set out hereunder:

1. Applicants living in dwellings deemed to be dangerous as defined in Section 3 of the Sanitary Services Act, 1964 or being displaced by operation of the Local Authority.
2. Applicants deemed to be homeless under Section 2 of the Housing Act, 1988
3. Applicants living in unfit and overcrowded conditions as defined in Sections 66 and 63 respectively of the Housing Act, 1966
4. Applicants living in unfit conditions as defined in Section 66 of the Housing Act, 1966.
5. Applicants living in overcrowded conditions as defined in Section of 63 of the Housing Act, 1966.
6. Applicants in need of housing on disability, medical, compassionate, or other similar grounds
7. Applicants not included in any other category above, who have been assessed and approved for Social Housing Support.

## 2.2 Estate Management

All council housing stock, including Traveller specific accommodation, is managed under the Council's policies for the management and maintenance of rented housing stock. Together with this all tenants are required to sign a tenancy agreement which outlines the terms and conditions of the tenancy including tenant responsibilities for maintenance, anti-social behaviour etc. Each tenant has a responsibility to ensure that the terms of the tenancy are met in full, and the Council will ensure that the terms are enforced. Estate management also includes securing the interest of tenants in the enjoyment of the house and the avoidance, prevention, and abatement of anti-social behaviour in the housing estates in accordance with Longford County Council's Antisocial Behaviour Strategy. Therefore, Longford County Council shall, in the interests of good estate management, use all legislative powers at their disposal to control anti-social behaviour on the part of all its tenants and applicants approved for social housing support.

## 2.3 Homelessness

Individuals or families who present and are assessed as homeless or are at risk of becoming homeless can avail of the Homeless Services. A full homeless assessment will be completed, and the most appropriate course of action will be established.

There is currently provision for adult only homeless female and male Travellers in Longford in St Martha's Hostel and Bethany House. The Hostels are staffed 24 hours a day and provide an essential service in Longford. Homeless Travellers must present to the Local Authority in Longford where they are assessed and advised to ensure the best possible outcome.

## 2.4 Temporary Dwellings

The Council will implement its procedures to ensure a coordinated response when temporary dwellings are identified, in accordance with the requirements of the relevant legislation as appropriate:

- Section 10 of Housing (Miscellaneous Provisions) Act 1992 as amended by Section 32 of the Housing (Traveller Accommodation) Act 1998
- Housing Miscellaneous Provisions Act 2002
- An Order of the District Court • Planning and Development Act 2000 (as amended)
- Local Government (Sanitary Services) Act 1948
- The Roads Act 1993 • Criminal Justice (Public Order) Act 1994 (as amended)
- Public Health (Ireland) Act, 1878 as amended by Environmental Protection Agency Act 1992.

A temporary dwelling means any tent, caravan, mobile home, vehicle, other structure or thing (whether on wheels or not) which is capable of being moved from one place to another, and is or was used for human habitation, either permanently or from time to time or was designed, constructed or adapted for such use. Public place means any street, road or other place to which the public have access whether as of right or by express or implied permission and whether the subject to or free of charge and any property or other land owned or occupied by or leased to a public authority. The Council will investigate the

circumstances of the household in the temporary dwelling and take appropriate action.

## 2.5 Transient Sites

Under Section 10 39(C) of the Act, a relevant housing authority in preparing an accommodation programme, must take into account the needs of transient Traveller families. The incidence of roadside or unauthorised encampments is infrequent in County Longford with no discernible pattern arising. In the preparation of the new Traveller Accommodation Programme 2025-2029, it is not considered that there is any identified need for the development of a Transient Site within the county. The issue can be reviewed on a regional basis in collaboration with adjoining Local Authorities should the circumstances change over the lifetime of the new Programme.

## Section 3 STRATEGY STATEMENT

### 3.1 Implementing Authority

Longford County Council is the authority responsible for implementing the Traveller Accommodation Programme 2025-2029. The Local Authority co-operates with other public and voluntary agencies as well as adjoining Local Authorities to meet the accommodation needs of Travellers. Several groups have an important role to play in assisting in the implementation of the programme including: -

- The Local Traveller Accommodation Consultative Committee (LTACC)
- The Strategic Infrastructure Strategic Policy Committee (SPC)
- Longford Community Resources Ltd. (LDC)
- Health Services Executive (HSE)
- Longford Westmeath Educational Training Board (LWETB)
- An Garda Siochana
- Voluntary Housing Bodies (AHBs)
- Department of Social Protection
- Department of Education
- Money Advice & Budgeting Service (MABS)
- Longford Traveller Interagency Group

It will be the responsibility of Longford County Council to seek the co-operation of the above groups to ensure the implementation of the new Programme. Progress in relation to the 2025-2029 programme will be monitored by the Local Traveller Accommodation Consultative Committee.

### 3.2 Provision of Accommodation

It is the aim of Longford County Council to provide accommodation, in so far as is possible, that responds to the different needs of Travellers. Accommodation for Travellers is provided across a range of options, and it is open to Travellers to opt for any form of accommodation. These include standard local authority housing, which is financed from the Department's capital allocations for social

housing, private rented accommodation or private housing assisted by local authorities or voluntary organisations and Traveller-specific accommodation which receives 100% capital funding from the Department. Traveller-specific accommodation includes group housing schemes and halting sites.

The identification of suitable sites for the provision of Traveller Group Housing continues to be a challenge. Sites owned by the Council may be used for this purpose together with the acquisition of additional sites if required and subject to the availability of funding. Loans under the Local Authority Home Loan Scheme are available to Travellers who wish to provide their own accommodation subject to the normal terms and conditions of the scheme.

### 3.3 Resourcing the Programme

Funding is made available by the Department of Housing, Planning and Local Government (the Department) for the provision of housing under the Social Housing Capital Investment Programme (SHCIP) and other funding streams as appropriate. All such housing provision is subject to the availability of funding. In addition, for the provision of Traveller accommodation, there is a separate stream of capital funding for the provision of Traveller-specific accommodation such as Group Housing, Halting Sites and Transient Sites for Traveller families. It is open to all local authorities to apply for and drawdown funds at any time in adherence with the single-stage and 4-stage approval processes on a case-by-case basis.

### 3.4 Co-operation with Approved Housing Bodies

Longford County Council continues to work with the various Approved Housing Bodies operating in the county for the delivery of the various social housing options funded under the Social Housing Current Expenditure Programme (SHCEP), the Capital Assistance Scheme (CAS) and the Capital Advance Leasing Facility (CALF).

### 3.5 Allocation of Accommodation

The allocation of properties is based on Longford County Council's Social Housing Allocation Scheme. Nominations are also provided to Approved

Housing Bodies from the Council's housing list for their tenancies. Separate waiting lists do not operate for members of the Travelling community. Special needs dwellings and old persons dwellings are allocated to housing applicants based on their specific needs. Traveller Group housing where provided, is allocated to Travellers who have requested and agreed to be accommodated together.

### 3.6 Interagency Consultation and Collaboration

Longford County Council will continue to work with other agencies concerned in the implementation of the Traveller Accommodation Programme including: Irish Traveller Movement, Pavee Point, Approved Housing Bodies, Health Service Executive, Tusla, An Garda Síochána, Education Services, Social Welfare Services, Longford Community Development Ltd., Longford Public Participation Network, MABS, adjoining local authorities and any other agency identified as the need arises.

### 3.7 Local Traveller Accommodation Consultative Committee (LTACC)

The role and distinct expertise of LTACC membership are recognised in relation to the successful implementation of the Traveller Accommodation Programme. In cases of specific urgent or crisis situations arising and where deemed necessary, the Chairperson of the LTACC may convene an emergency meeting.

### 3.8 Backup Services and Support

In Q2 2024 Longford County Council secured sanction for the position of Traveller Liaison Officer for an Initial 2 year period. A recruitment campaign was completed in Q2 2024 and the successful candidate will be appointed in Q3 2024. The Traveller Liaison Officer will work closely with the Traveller Community in Longford to assist them with a range of issues related to their housing requirements and needs.

### 3.9 County Development Plan

Provisions contained in the Longford County Development Plan 2021-2027 are sufficient to realise the Traveller accommodation objectives set out in the Traveller Accommodation Programme 2025 – 2029.

### 3.10 Monitoring Arrangements

The implementation of the programme will be monitored as follows:

- A progress report will be presented to the Local Traveller Accommodation Consultative Committee at the end of each year of the programme.
- A progress report will be presented to the Housing Strategic Policy Committee at the end of each year of the programme
- Through the Annual returns to the Department of Housing, Planning and Local Government
- A Mid Term Review of the Traveller Accommodation Programme will be carried out in 2027.



## Section 4 ASSESSMENT and IDENTIFICATION of ACCOMMODATION NEEDS

Section 6 (as amended) of the Housing (Miscellaneous Provisions) Act, 2009 requires Housing Authorities, for the purposes of preparing a programme, to assess the accommodation needs of Travellers who under Section 20 of the said Act are qualified for social housing support, including the need for sites. Such assessment will have regard to; the estimate of the number of Travellers for whom accommodation will be required during the lifetime of the programme; the Annual Summary of Social Housing Assessment as it relates to Travellers; the need for transient sites and consideration of the views of the Local Traveller Accommodation Consultative Committee. Consideration of iHouse is the first platform for identifying Traveller accommodation need. In 2022 a Traveller Ethnic Identifier was added to the Social Housing application form. Evidentially, it is the case in Longford, that, Travellers in unauthorised occupation of accommodation do not apply to the Council for housing support.

### 4.1 Initiating the process for carrying out the Assessment

In 2023 Longford County Council in conjunction with the LTACC engaged CENA Culturally Appropriate Homes to conduct a Traveller to Traveller assessment of Traveller accommodation needs in Longford town.

Methodology of the Needs Assessment:

Consultation with Traveller households in Longford Town was carried out by a team of fieldworkers. The team was made up of Travellers – the majority of whom are based in Longford, and all of whom had participated in a three-month-long training programme delivered by Cena Approved Housing Body. Four people completed the training course and became involved in household engagement. The team of fieldworkers was supported by staff from Cena, all of whom are also Travellers and trained in accommodation needs analysis.

Aims:

The process was driven by the perceived need to gain an in-depth and comprehensive understanding of accommodation needs within the Traveller community in Longford. The fact that Travellers were enabled to engage directly with members of their own community meant that responses to the

needs assessment were more detailed and more informed. Through this process it was aimed to:

1. *Gain a more accurate picture of needs and aspirations regarding accommodation.* A more in-depth discussion with families and individuals led to more informed and considered responses than would have been possible through the more traditional form-filling exercise.
2. *Understand more about long-term aspirations or more sustainable responses to accommodation needs.* With many Traveller households living in emergency and/or unsuitable accommodation, it was important to get feedback on what might be more long-term and permanent solutions. Direct engagement with families allowed this conversation to take place – enabling people to think beyond the critical short-term needs and towards what might be appropriate for the longer-term and for future generations. It also gave the opportunity for people to consider options on an informed basis – understanding more about what is possible and feasible.
3. *Create a resource for future planning and delivery of Traveller accommodation.* It was seen as being important, from the outset, that results from this process would feed directly into the planning of future accommodation provision. All results were entered into a dedicated database, and this has been used by Longford County Council in planning the current Traveller Accommodation Programme. It is acknowledged, however, that the accommodation needs identified cannot be fully addressed within the time-frame of one TAP. And results from this process (making full use of the database) will continue to inform Traveller Accommodation Programmes into the future. The importance of results from the process is also recognised in relation to planning and delivery of other services in addition to accommodation. Information gathered on health and living conditions, household profile etc is also of direct use to Health Service providers and to those promoting progression opportunities. Both the HSE and the Local Development Company in Longford have provided support to the process, and both will have access to results via the completed database.

## Issues Explored in Consultation with Households

All households were asked to give feedback on:

- Family size, age profile etc
- Characteristics of their current accommodation, including:
  - Nature of tenure
  - Length of time in the accommodation
  - Instances of overcrowding where relevant
  - Major issues or challenges associated with structure or conditions
  - Any association with Traveller culture (including animal-keeping, caravans, sheds etc)
- Health challenges that might exist - especially where these (such as disability for example) might have a bearing on future accommodation needs.
- Their relationship with housing services and housing provision – particularly whether, and how long, households are on the local authority housing or transfer lists.
- Their preference in relation to future accommodation, including whether this is:
  - In rural or urban areas
  - In areas they see as possible or preferable and areas they see as being problematic
  - In individual household setting or part of broader extended family situation
  - In houses rather than more traditional site, group housing or 'camp' settings.
  - In situations where aspects of Traveller culture can be promoted and maintained

This needs assessment along with Information gathered from the 2023 Summary Social Housing Assessments, data from Census 2022, as well as the National Annual Traveller count 2023 have been used in preparation for the assessment of the accommodation needs of Travellers In County Longford.

General Summary Needs Assessment Longford Town:

- Total number of households completing = 263. 57 of these were one-person households. The number of families consulted was therefore 206
- This represents a total number of 873 individuals – and an average household size of 4.2 (omitting single-person households)
- Very high numbers in younger age groups (234 children aged five or under – 27% of entire population)

#### 4.2 Identified Need

The process of understanding the full extent of accommodation needs for the Traveller community continues to present challenges in ascertaining the true need for Traveller accommodation. An ethnic Identifier for Travellers was introduced on the Social Housing Support application form in 2022, however, there appears to be a reluctance within the Traveller community to identify as a member of the Traveller community. The reasons for this appear to be complex but may include a fear that Traveller households will only be considered for Traveller-specific accommodation if they identify as Travellers. Through the LTACC Longford County Council has sought to alleviate this fear and reassure Traveller applicants that they can be considered for all forms of housing support.

At the time of drafting, there were 14 open applications on iHouse where the applicants had identified as members of the Travelling Community. Of those 14, 9 have selected Standard Social Housing as their preferred primary support, 1 selected Traveller Specific Accommodation, 1 Leasing and the remaining 3 did not select any preferred primary support.

**Table 2: Open iHouse Traveller applications**

| <b>PRIMARY SUPPORT</b>  | <b>Total</b> |
|-------------------------|--------------|
| No Preference           | 3            |
| Leasing                 | 1            |
| Standard Social Housing | 9            |
| Traveller Group Housing | 1            |
| <b>Grand Total</b>      | <b>14</b>    |

**Table 3: Annual Traveller Count 2023**

\* Accommodation needs to be deemed met, however, those on HAP remain on the transfer list.

|   | <b>Accommodation Type</b>  | <b>Number of Households</b> |
|---|--|-----------------------------|
| * | <i>Number of families living in Standard Lettings</i>  | <i>202</i>                  |
|   | Number of families living in LA Traveller group houses   | 0                           |
| * | <i>House acquired by local authority</i>   | <i>4</i>                    |
| * | <i>Number of families living in houses acquired by Travellers without LA assistance (estimate)</i> | <i>25</i>                   |
|   | Total number of families living in Private Rented accommodation (estimate)                         | <b>114</b>                  |
| * | <i>(i) Rental Accommodation Scheme (RAS)</i>   | <i>18</i>                   |
| * | <i>(ii) Rent Supplement</i>  | <i>25</i>                   |
| * | <i>(iii) HAP</i>   | <i>29</i>                   |
| * | <i>(iv) Long term leasing</i>  | <i>3</i>                    |
|   | (v) Own Resources (estimate)   | 39                          |
| * | <i>Total number of families living in Voluntary Housing</i>  | <b>21</b>                   |
|   | <b>Total</b>   | <b>366</b>                  |
|   | Total number of families SHARING accommodation with other families                                 | <b>23</b>                   |
|   | Total number of families living as tenants on serviced halting sites of which                      | <b>2</b>                    |
|   | Number of other families SHARING with tenant families on serviced halting sites                    | <b>1</b>                    |
|   | Total number of families on Transient Sites  | <b>2</b>                    |

|  |  |            |
|--|--|------------|
|  | Total number of families on Unauthorised sites                           | <b>5</b>   |
|  | <b>Total number of Traveller families in LA on the date of the count</b> | <b>399</b> |

It should be noted that while this survey provides information on need this need is not reflected in terms of social housing applicants. For the purpose of this programme and based on the above table **72 Traveller households** require accommodation during the lifetime of this programme.

### **Findings CENA Longford Town Needs Assessment**

Nature of Tenure:

- The vast majority were local authority tenants \*
- **18** households were in unauthorised tenancies
- **36** were living with parents
- 18 were in Approved Housing Body tenancies \*
- 27 owned their own home \*
- **13** households are living in trailers, mobiles or chalets (2 of these families are located on side-of-the-road

*\* Accommodation needs deemed to be met.*

**The total current unmet housing need is 67 units.**

### 4.3 Projected Need

The provision of social housing support is demand driven. The Council has regard to future demand to cater for the emerging need. The exercise in projecting need for the Traveller Accommodation Programme is hindered as there are so many variables for consideration. The Council's capacity to cater for projected need is through the provision of all available social housing supports subject to approval of housing need. It is considered that the provision of standard housing supports and the existing vacancies in the group housing schemes will in the main provide for the projected need of the Traveller community. Extrapolation of Census 2022 figures for the Traveller community nationally indicates that over 25% of the Traveller population are aged between 15 and 29 years old. Of those aged 15-24 years, 85% are of single status, this drops to 51% for those aged 25-29 years. This results in an average of 68% across the age range 15-29 years who are single.

Applying this national data to our local figures would indicate that there is potentially in the region of 155 single Traveller Individuals aged 15-29 years. Given that the male: female Traveller population is approximately 50:50 this could yield approximately 77 new family formations during the period 2025-2029. If half of this number were to apply and be deemed eligible for housing support that would result in an additional need of **38 units** to accommodate potential new family formations throughout the lifetime of this programme.

### 4.4 Reported Disability Need

Disability needs within the Traveller community are assessed on a case-by-case basis upon submission of the standard HMD Form. Any evidenced need will be considered as the need arises during the lifetime of the programme.

#### 4.5 Total Need for inclusion in Traveller Accommodation Programme 2025-2029

The following need for Traveller accommodation need has been identified for inclusion in the Programme.

**Table 4: Annual Targets for Implementation of Programme 2025 – 2029**

| <b>TARGETS</b>                               | Year 1<br>2025 | Year 2<br>2026 | Year 3<br>2027 | Year 4<br>2028 | Year 5<br>2029 | <b>TOTALS</b> |
|--|----------------|----------------|----------------|----------------|----------------|---------------|
| TRANSIENT                                    | 0              | 0              | 0              | 0              | 0              | <b>0</b>      |
| PERMANENT<br>HALTING SITE 2<br>OCCUPIED BAYS | 0              | 0              | 0              | 0              | 0              | <b>0</b>      |
| STANDARD LA<br>HOUSING                       | 15             | 14             | 15             | 14             | 15             | <b>73</b>     |
| HAP  | 2              | 3              | 2              | 2              | 2              | <b>11</b>     |
| RAS/LEASING                                  | 2              | 2              | 2              | 3              | 2              | <b>11</b>     |
| VOLUNTARY<br>HOUSING BODIES<br>(AHBS)        | 3              | 2              | 2              | 2              | 2              | <b>11</b>     |
| TRAVELLER SPECIFIC<br>GROUP HOUSING          | 0              | 2              | 0              | 2              | 0              | <b>4</b>      |
| <b>TOTAL</b>                                 | <b>22</b>      | <b>24</b>      | <b>21</b>      | <b>23</b>      | <b>21</b>      | <b>110</b>    |

#### 4.6 Illegal Encampments

There are currently no illegal encampments in Co. Longford.

#### 4.7 Transient Halting Site

While it is recognised that there is a requirement to provide a network of transient sites for Travellers in the context of recognising nomadism as a feature of Traveller culture, this must be developed on a regional basis in conjunction with other Local Authorities. It is not currently considered necessary to provide a transient site in Co. Longford.



## Section 5 MEASURES FOR IMPLEMENTATION

### 5.1 Standard Social Housing

This Council will continue to allocate properties as they become available in line with our scheme of letting priorities. Traveller households who have expressed interest in standard social housing will be considered in their area of preference. Table 4 above sets out annual targets for Traveller accommodation delivery during the lifetime of the programme. It remains a difficulty to accurately record allocations to Travellers where the household has not identified as Travellers. This continues to be estimated based on local and housing staff knowledge.

### 5.2 Traveller-Specific Housing

Longford County Council will continue to undertake an annual inspection of the permanent halting site. This includes consultation with the residents regarding any maintenance issues and improvements required on the site. This is in addition to responding to any routine maintenance requests logged by the residents throughout the year.

All fire equipment is checked and tested.

A total of €41,236.50 has been spent on upgrade and maintenance works on the 2-bay halting site at Willow Park over the lifetime of the TAP 2019-2024. (As at 02/07/2024).

### 5.3 Additional Housing Supports

There are a range of other housing supports available to Travellers in addition to social housing provision as follows:

#### 5.3.1 HAP - Housing Assistance Payments

A Traveller household who is approved for social housing support may seek accommodation in the private rented sector and apply for support under the HAP scheme. If approved the local authority will pay a contribution towards the monthly rent and the recipients will be charged a differential rent based on their household weekly income in accordance with the Differential Rents Scheme in operation by the

Council. As this is a form of social housing support the accommodation needs are met, however, the HAP recipient can elect to remain on the transfer waiting list and be considered for standard social housing support as outlined previously. The tenancy is governed under the Residential Tenancies Acts.

Homeless HAP offers additional benefits should the household be assessed as at risk of Homelessness.

### 5.3.2 RAS - Rental Accommodation Scheme

A Traveller household who is approved for social housing support may seek accommodation in the private rented sector and if the landlord is interested can apply to have the property taken into the RAS scheme. This is a three-way agreement whereby the local authority leases the property under a Residential Tenancy Agreement for the tenant and agrees to pay an agreed monthly rent to the landlord for the property on condition that the tenant continues to pay a differential rent to the authority by way of a Rent Contribution Agreement. As this is a form of social housing support the accommodation needs are met.

### 5.3.3 Local Authority Home Loan

A Local Authority Home Loan is a government-backed mortgage for first-time buyers and fresh start applicants, now available nationwide from your local authority. It can be used to purchase a new or second-hand property or for self-build. A Local Authority Home Loan provides up to 90% of the market value of the property. The maximum loan amount available in Co. Longford is €247,500.

### 5.3.4 Caravan Loans

Pilot Caravan loans were operated between 2021-2024 offering up to a maximum of €40,00 towards the purchase of a caravan/mobile home for members of the Travelling community. The Department is now completing a comprehensive evaluation of the pilot caravan loan schemes, based on data collected from local authorities and other

stakeholders, with a view to considering options for the introduction of an enduring scheme.

One Caravan Loan was drawn down of €40,000 In Longford in 2024.

#### 5.3.5 Tenant (Incremental) Purchase Scheme 2016

This is a scheme that allows local authority tenants to buy their homes.

The Tenant (Incremental) Purchase Scheme 2016 was introduced under the Housing (Sale of Local Authority Houses) Regulations 2015 as amended. The rules of the scheme were updated in 2023 by the Housing (Sale of Local Authority Houses) (Amendment) Regulations 2023.

The eligibility criteria for the Tenant (Incremental) Purchase Scheme 2016 changed on the 29th January 2024. The minimum reckonable income amount has reduced from €12,500 to €11,000. The length of time you must be in receipt of social housing supports remains at 10 years. In the case of joint tenancies, only one tenant must be in receipt of social housing supports for 10 years.

#### 5.3.6 Grants for People with a Disability

Grants are available to assist in the carrying out of works which are reasonably necessary for the purposes of rendering a house more suitable for the accommodation of a person with a disability who has an enduring physical, sensory, mental health or intellectual impairment. They are available to both tenants of council houses and to private house owners. Applications will be considered in accordance with the terms and conditions of the schemes and are subject to funding availability. Tenants should note that the Council will always consider the most cost-effective option to address the housing needs of the disabled person, which includes transferring to a more suitable dwelling.

#### 5.3.7 Housing Aid for Older Persons Grant

The Scheme of Housing Aid for Older People is available to assist older people 66 years of age (or over) living in poor housing conditions in their

privately owned homes to have necessary repairs or improvements carried out. Grant assistance is means-tested, is provided on a priority basis and is subject to funding availability.

#### 5.3.8 Housing Transfer

Tenants of the Council or Approved Housing Bodies may apply for a transfer to move to alternative accommodation in certain circumstances e.g. under-occupancy, over-crowding or where the house no longer meets their needs if they have a disability. Transfer eligibility is based on the criteria of the transfer policy in place at the time of application.

## APPENDIX 1 Membership of the Local Traveller Accommodation Consultative Committee 24

| Name                       | Address                               |
|----------------------------|---------------------------------------|
| Cllr. Mark Casey           | Elected Cllr. - Chairperson           |
| Cllr. Gerry Hagan          | Elected Cllr.                         |
| Cllr. Peggy Nolan          | Elected Cllr.                         |
| Cllr. David Cassidy        | Elected Cllr.                         |
| Cllr Martin Monaghan       | Elected Cllr.                         |
| Cllr.Martin Skelly         | Elected Cllr.                         |
| Mr. Terry Rooney           | LA Official (S.E.O.)                  |
| Ms. Anne Marie Blessington | LA Official (Administrative Officer)  |
| Mr. John Brannigan         | LA Official (Director of Services)    |
| Mr. Ciaran McCormack       | LA Official (Housing Welfare Officer) |
| Ms Brenda Duffy            | LA Official (Senior Staff Officer)    |
| Ms. Orla Maguire           | LA Official SEE                       |
|                            |                                       |
| Ms. Mary Nevin             | Traveller Rep.                        |
| Mr. Martin Mongan          | Traveller Rep.                        |
| Bridget Power              | Traveller Rep.                        |
| Patrick Stokes             | Traveller Rep.                        |
| Mary Mimmagh               | HSE PHN rep.                          |

|                        |  |
|------------------------|--|
| Jimmy Todd             | HSE (Community Development Officer)              |
| <i>Position vacant</i> | Traveller Primary Healthcare Project Co-ord.LCRL |

## APPENDIX 2 Submissions



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

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

February 2024

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

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

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

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

## Traveller ethnicity

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

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

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

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

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



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

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

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

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

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

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

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

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

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

14. **Play facilities** should be provided in Traveller specific accommodation in line with Action 61 in NTRIS<sup>1</sup>.

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

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

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

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

## Traveller Accommodation Legal and Policy Obligations

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

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

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

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

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

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

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

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

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

*The National Youth Homelessness Strategy*<sup>7</sup>, obligates councils to

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

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

*Moratorium Part 8*<sup>8</sup> of the planning process The temporary time-limited moratorium on Part

8 of the planning process, January (2023) had a potential benefit for councils in the acceleration of Traveller specific projects.

## Policy Reforms and Reviews since the TAP 2019-2024

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

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

*The Office of the Planning Regulator conducted a Case Study Paper entitled Traveller Accommodation and the Local Authority Development Plan 2021<sup>11</sup>, and surveyed existing local authority development plans (1) and Traveller Accommodation Programmes (2) (TAP) to examine links between their policies and objectives relating to Traveller-specific accommodation. The purpose was to address knowledge gaps, to provide support for local authorities in performing their duties and to highlight best practice to foster shared learning.*

## Current Need

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

These figures would undoubtedly increase if they were to be based on the ETHOS definition of homelessness, which includes overcrowding and couch surfing. In December 2023, only 3% of rental accommodation was available through HAP<sup>13</sup>. The housing crisis has a disproportionate impact on Travellers, who already face discrimination when accessing private rental accommodation. Over 8,000 Travellers are in need of accommodation, including 2000 families in overcrowded or emergency provision, or roadsides. Additionally, 13% of all homeless adults nationally were Travellers<sup>14</sup>. As a comparator to national homeless findings (children and adults), this could equate to 1 in 5 Travellers as homeless, as a low estimate.

### *Social Housing Delivery Trends.*

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

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

### *Need for Traveller for Traveller Homelessness Task Forces.*

National Homeless Action Committee (NHAC). There is no national audit or assessment of the need for Traveller homelessness. Homeless services and agencies do not collect Traveller data. Local authorities are responsible for the adoption of Homelessness Action Plans that address the challenges for all homeless people including Travellers, but an audit<sup>16</sup> of local authority Traveller Accommodation Programmes (2014-2019) showed only some local collect data for those in Emergency or homeless accommodation, and 12 of the 31 did not record data with most deferring duty to homeless services. There is a specific urgent need for action focussed local Traveller Homelessness Task Forces, and a central

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

## Demographic trends since the last TAP

Population Data – The recent Census provides some suggestive baseline of community demographic patterns, however, is not a total count or assessment nationally. The rate of completion of the ethnic question by Travellers was enumerated in 2022 as 32,949 people<sup>17</sup>. The more accurate account is found in figures compiled by the Department of Housing / Local Authority annual estimates (November 2022) accounting for approx. 48,732 people working off a household size of 4.

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

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

## Consultation

It is imperative that the TAPs are prepared and reviewed with adequate consultation and oversight. Circular 35/2018<sup>20</sup> stated “It is essential that Traveller Accommodation Programmes are prepared in a consultative manner. The Act requires that housing authorities consult with adjoining housing authorities, the HSE, approved housing bodies, the Local Traveller Consultative Committee, other local Traveller representative groups, community and interest groups and the public in general. The purpose of broad consultation ensures that the interests of all concerned with or affected by proposals for Traveller accommodation are considered and to facilitate a planned and comprehensive response by housing authorities to the accommodation needs of Travellers’.

## Consultation Process

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

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

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

## Statement of Strategy

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

## Assessment of Needs

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

## Traveller Accommodation Expert Review July 2019<sup>22</sup>

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

### *Expert Review Recommendation A.8:*

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

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

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

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

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

## Traveller Specific Accommodation

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

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

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

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

## Development of Transient Sites

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

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

## Tenant Participation

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

## Caravan Loan Scheme

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

## Fire Safety in Traveller Accommodation

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

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



## Proposed Checklist for development of Traveller Accommodation Programmes 2025 - 2029

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

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

## Appendices

### Appendix A

#### **Summary of Requirements for the Traveller Accommodation Programmes Provided in the DHLGH Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025-2029<sup>24</sup>**

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

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

## Appendix B

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

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

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

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

## Appendix C

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

#### Public bodies

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

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

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

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

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

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

- (a) issue guidelines, or
  - (b) prepare codes of practice in accordance with section 31,
- in respect of the development by public bodies of performance measures, operational standards and written preventative strategies for the purpose of reducing discrimination and promoting human rights and equality in the public sector workplace and in the provision of services to the public.

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

body to—

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

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

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

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

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

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

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

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

(a) may, or

(b) where the Minister has requested the review, shall,

make a report of the review to the Minister and any such report shall include such recommendations as the Commission thinks appropriate.

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

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

## References

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<sup>1</sup><https://www.gov.ie/pdf/?file=https://assets.gov.ie/43310/d7d54fbff0f4418982856e7dddaf78c1.pdf#page=null>

<sup>2</sup>Government of Ireland, The Planning and Development Act 2000, Dublin: Dublin Stationery Office <https://www.irishstatutebook.ie/eli/2000/act/30/enacted/en/html>

<sup>3</sup><https://www.google.com/url?q=https://www.gov.ie/en/publication/225d8-development-plan-guidelines/&sa=D&source=docs&ust=1707408247122472&usg=AOvVaw239y7uBQNF2EVARxdgxTFj>

<sup>4</sup> <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

<sup>5</sup> <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

<sup>6</sup> <https://www.irishstatutebook.ie/eli/2021/act/26/enacted/en/html>

<sup>7</sup> <https://www.gov.ie/en/publication/69597-youth-homelessness-strategy/>

<sup>8</sup><https://www.gov.ie/en/press-release/6ab3a-government-counter-motion-on-the-private-members-business-motion-re-eviction-ban/>

<sup>9</sup><https://www.housingagency.ie/publications/traveller-accommodation-expert-review-2019>

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- <sup>10</sup><https://www.ihrec.ie/our-work/equality-review/#:~:text=In%202019%2C%20the%20Commission%20invited,obligations%20on%20Traveller%20specific%20accommodation.>
- <sup>11</sup><https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
- <sup>12</sup><https://www.irishtimes.com/ireland/social-affairs/2024/01/05/number-of-people-in-emergency-accommodation-hits-new-high-of-13514/>
- <sup>13</sup><https://www.simon.ie/e-publication/locked-out-executive-summary-december-2023/>
- <sup>14</sup> [https://fra.europa.eu/en/publication/2020/roma-travellers-survey\(2020\)](https://fra.europa.eu/en/publication/2020/roma-travellers-survey(2020))
- <sup>15</sup><https://www.gov.ie/en/collection/6060e-overall-social-housing-provision/#local-authority-build>
- <sup>16</sup><https://itmtrav.ie/wp-content/uploads/2021/08/PDF-ITM-Traveller-Accommodation-Programme-Analysis.pdf>
- <sup>17</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- <sup>18</sup><https://www.gov.ie/pdf/?file=https://assets.gov.ie/276539/9248d855-1f03-42c3-be31-def188fd7a8.pdf#page=null>
- <sup>19</sup><https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>
- <sup>20</sup><https://www.wicklow.ie/Portals/0/Documents/Housing/Traveller-Accommodation/Circular%20Housing%202035.2018%20%20%20205th%20Traveller%20Accommodation%20Programme%202019%20-%202024.pdf>
- <sup>21</sup> Government of Ireland, Irish Human Rights and Equality Commission Act 2014, S.42, Dublin: Dublin Stationery Office.
- <sup>22</sup><https://www.paveepoint.ie/wp-content/uploads/2019/07/Expert-Review-Group-Traveller-Accommodation.pdf>
- <sup>23</sup><https://www.opr.ie/wp-content/uploads/2021/10/Traveller-Accommodation-and-the-Local-Authority-Development-Plan-Case-Study.pdf>
- <sup>24</sup> DHLGH (2023) *Guidelines For The Preparation, Adoption And Implementation Of Local Authority Traveller Accommodation Programmes 2025-2029*



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

**February 2024**



## About National Traveller MABS

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

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

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

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

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

In the past National Traveller MABS has supported Travellers in accessing culturally appropriate accommodation through a number of successful Caravan Loan Guarantee Schemes. A 2015 review of these schemes made a number of recommendations that may inform the provision of similar schemes<sup>1</sup>. In 2018 we also undertook a study into the cost of mobile home/trailers. This study also made a number of recommendations in relation to the provision of fuel efficient affordable culturally appropriate accommodation<sup>2</sup>. In 2022 we undertook further research in collaboration with Atlantic University Sligo into the energy

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

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

efficiency of mobile homes and made further recommendations on providing energy efficient culturally appropriate homes<sup>3</sup>. We have also written an outline for a trailer rental scheme which we believe should run alongside the trailer loan scheme to give families the opportunity to live in residential standard, energy efficient homes regardless of their income<sup>4</sup>.

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

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

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

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

## **Recommendations for the Traveller Accommodation Programme 2025-2029**

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

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

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

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

### **Trailer Loan Scheme**

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

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

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

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

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

The funding allocated for the scheme is often insufficient to meet the needs of the Traveller community, leading to the creation of long waiting lists and delays in families being able to access loans. The maximum loan amount available under the current scheme is €40,000.

Research carried out by National Traveller MABS in conjunction with Atlantic University Sligo in 2023 found that trailers that conform to British Standard BS 3632, which mean the trailer is suitable for year round living and conforms to energy efficient status begin at €60,000. This price does not include disposal, installation, delivery and associated charges which can add another €10,000 to the price of the trailer.

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

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

## **Trailer Rental Scheme**

Our recent research study into the cost of trailers found a range of trailers on offer ranging from €15,000 to over €100,000. However a residential standard trailer, one which is suitable for year round living and which conforms to the British Standard BS3626.2015 began at €60,000 for a two berth trailer. Residential standard trailers, as opposed to units used as holiday homes, are more fuel efficient and provide families with a better quality of accommodation. We acknowledge and know that some Traveller families on low incomes will not be in a position to purchase a residential standard trailer or qualify for the trailer loan scheme and this is feedback we have received from MABS money advisors and from local authorities during the current iteration of the trailer loan scheme. A rental scheme would ensure that Traveller families would be able to access good quality affordable accommodation. Our recent publication has called for and outlined how a trailer rental scheme could operate and could offer benefits to both families and the local authority and Government<sup>5</sup>.

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

## **Addressing fuel poverty**

National Traveller MABS is concerned with the reduction and elimination of fuel poverty in the Traveller community. Fuel poverty arises out of the relationship between household income, energy efficiency of the dwelling and fuel prices and is an acute problem for low income groups in particular. Households are deemed to be in fuel poverty when they spend 10% or more of their income on fuel<sup>6</sup>.

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

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



Research carried out by National Traveller MABS in 2019 found that 77% of Travellers living in trailers were living in energy poverty due to the poor insulation and lack of energy efficient measures<sup>7</sup>. A follow up study carried out in 2022 showed that a large majority of the Traveller families living in trailers surveyed (~75%) were paying between €120 - €360 on electricity, and €105- €400 on heating fuels (i.e. gas, coal wood) on a monthly basis<sup>8</sup>. The energy expenditure estimates from the survey carried out in this research were similar to that in the 2019 report showing that there has not been any significant improvement in reducing energy costs for Travellers living in trailers in the intervening years. The data was collected prior to the energy crisis price increases so we can safely assume that those figures have increased even further in the past two years.

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

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

Local authorities in conjunction with SEAI and the Department of Climate and Communications and the Department of Housing Local Government and Heritage should facilitate energy efficiency information initiatives for Travellers living in trailers. This will start with modest targeted efforts and will hopefully produce a track record of success by focusing on accessible energy efficiency measures (i.e. the use of LED lights) that would contribute to reduced energy spend<sup>9</sup>. This could be achieved by employing and training

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

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

<sup>9</sup> IBID

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

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

There is a need for more practical demonstration and pilot activities with regards energy efficiency measures focused on Travellers<sup>10</sup>. Local authorities are in a prime position to be at the forefront of these initiatives. With 77% of Travellers in trailers living in energy poverty in 2019 we know that the situation has only gotten worse over the intervening years<sup>11</sup>. As part of retrofitting of Traveller specific accommodation and when planning new sites consideration should be given to the installation of green energy technologies. These could include the installation of wind turbines on sites which would have the potential to power the entire halting site, removing the need for commercial electricity and also allowing for the local authority to be able to sell energy back into the national grid. Another potential solution could be planning for the installation of solar panels on halting sites. Currently there are issues with installing panels on halting sites due to the tight dimensions of the bays and regulations regarding the closeness of structures to fire walls etc. With a little foresight and sound technological advice from technical experts in SEAI as well as grants from SEAI community funds etc. local authorities are uniquely positioned to be at the forefront of incorporating green technologies into Traveller specific accommodation as well as addressing and reducing fuel poverty among the community.

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

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

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

## **Community Consultation**

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

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

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

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

## **Public Sector Duty**

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

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

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

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

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

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

## **Equality Reviews**

The lessons learned from the IHRC equality reviews should be adapted into the TAP to . The Irish Human Rights and Equality Commission is an independent statutory body in Ireland tasked with promoting and protecting human rights and equality. The Commission has highlighted the importance of equality reviews in assessing and improving Traveller Accommodation Programmes across Ireland. In a report published in 2021, the Commission highlighted the ongoing inequality and marginalisation faced by the Traveller community in accessing suitable and adequate accommodation<sup>12</sup>.

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

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

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

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

## IRISH COALITION TO END YOUTH HOMELESSNESS

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

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

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

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

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

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

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

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

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

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

<sup>3</sup> Action 2.

<sup>4</sup> Action 4.

<sup>5</sup> Action 8.

<sup>6</sup> Action 15.

<sup>7</sup> Action 23.

**Submission from Longford Community Resources clg (including the Traveller Primary  
Healthcare project) in relation to  
The New Traveller Accommodation Programme 2024-2029**

**Introduction**

The following submission is based on on-going work with Travellers in County Longford through our on-going work in the Social Inclusion Community Activation Programme and the Traveller Primary Healthcare Project.

On the basis of this, Longford Community Resources clg staff would like to highlight the following issues and needs to Longford County Council in relation to the new Traveller Accommodation Programme for the five year period of 2024-2029.

**Issues Highlighted**

**Overcrowding**

Overcrowding continues to be a concern for many Traveller families in County Longford. Some parents may have their adult children living with them and in some circumstances their children's spouses or even their grandchildren may also be living in the one household. This a major concern in relation to health and safety.

**Discrimination**

Travellers noted that some find it difficult to access suitable private rented accommodation due to discrimination; e.g. based on certain surnames.

**Healthy Environment**

Accommodation provided as part of the new TAP needs to fit for purpose. A number of Travellers have experiences of poor living conditions due to dampness, draughts, etc. In relation to this facilities in the Willow Park Halting site need to be improved as a matter of urgency.

**People with Disabilities**

If someone within a household has a disability or serious illness this needs immediate attention because if a house is not equipped properly this could be a potential safety concern. Fire safety is a real concern.

**Accommodation Needs**

Travellers feel they have no choice or alternative than to live in houses. Some Travellers may prefer to live in houses but not all Travellers do. There is a need to consider Traveller specific accommodation – halting sites and group housing - and temporary accommodation and to have these options available for consideration when planning and delivering accommodation for Travellers in the future.

### **Suggestions**

- Longford County Council should continue and accelerate work with Cena – the Traveller Housing Agency.
- The halting site in Willow Park should be upgraded as a matter of urgency. The unit there needs to be upgraded, issues regarding drainage, sewage and heating should be addressed.
- Longford County Council should undertake refresher training for staff in relation to the public sector equality and human rights duty as this is a legal obligation.
- A clearer communication system between councilors and the Traveller community is needed to build better relationships. It would also ensure Travellers are kept informed about accommodation issues affecting them. It needs to be kept in mind not everyone can read and write so other ways of communication are essential.
- There is a need for an appropriate approach to identifying what a Traveller's ideal home may be, without jeopardizing their current accommodation need.
- Halting sites and group housing should be considered as accommodation options.
- Projected needs as well as present needs for the next five years should to be considered for the new TAP.
- Appropriate procedures and protocols need to be put in place for the unexpected. Temporary halting sites and transient accommodation should be considered.
- Medical factors such as disabilities and serious illnesses must be addressed when providing Travellers with accommodation, as if they are not addressed it can lead to potential hazards.
- Locations should be named so that the TAP is capable of being implemented.
- Compatibility of tenants needs to be considered when allocating people to accommodation.
- Facilities for Travellers need to be at an appropriate standard. Also, if overcrowding is present additional facilities should be provided to meet the additional needs.
- Longford local authority should inform the LTACC of their budget for the new Traveller Accommodation Programme and the costs for implementation.
- The Local Authority County Manager should be called upon to use their emergency powers to provide emergency accommodation if families are living on roadside encampments awaiting permanent accommodation.

### **Suggestions in relation to the LTACC**



- The LTACC should meet a minimum of 4 times a year.
- Longford LTACC should set indicators and undertake yearly monitoring to assess the progress of Longford's TAP.
- Longford's LTACC should do an annual report to describe actions undertaken and outcomes achieved. This report should be given to the local authority and the National Accommodation Consultative Committee.
- The LTACC should formally report to the appointing Local Authority Manager & Director of Services twice a year. The Manager and Director of Services should formally be asked to meet with the LTACC once a year, on completion of the LTACC's Annual Report.
- The position of Chairperson should be reviewed at the end of the second year of appointment; this position should be rotated around members of the LTACC. The position of Chair and Vice Chair should not be held by people in the same category of representative roles.