DRAFT Traveller Accommodation Programme
2014 – 2018
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Section 1: Overview

1.1 Introduction

Dublin City Council is required by the provisions of the Housing (Traveller Accommodation) Act, 1998 to prepare and adopt a five year Traveller Accommodation Programme to meet the existing and projected accommodation needs of Travellers in its administrative area.

The current Dublin City Council Traveller Accommodation Programme will expire on 31st December 2013 and the new Programme will cover the period from 1st January 2014 to 31st December 2018.

There are currently 800 Traveller families residing in the City. These families are accommodated in a range of accommodation types from Traveller specific group housing or halting sites to Standard housing.

This Programme sets out the actions that Dublin City Council will implement to meet the current and future accommodation needs of Traveller families within the City over the course of the period 1st January 2014 to 31st December 2018

Section 2: Policy Statements

(A) Dublin City Council is committed to the provision of high quality Traveller Accommodation, where possible in accordance with the aspirations and desires of the majority of Traveller Families identified in the Assessment of Need.

(B) The Accommodation Programme will operate within the context of relevant legislation including:

- The Planning and Development Code.

(C) The Dublin City Council Development Plan 2011-2017 states that it is the City Council’s policy to ‘recognise the separate identity, culture, tradition and history of the Travelling people and to reduce the levels of disadvantage that Travellers experience’. It also states that Dublin City Council will ‘provide a range of accommodation options for Travellers’ in the City Council’s administrative area. (DCC Development Plan 2011-2017, pg. 164) This Traveller Accommodation Programme reiterates this commitment and in doing so the City Council recognises Travellers’ cultural identity as a minority group, and strives to accommodate Travellers in a culturally appropriate way catering for their social needs.
A new Scheme of Lettings for Traveller Specific accommodation will be introduced. It is the City Council’s intention to set up an LTACC sub-group to investigate the most appropriate method of allocations for Traveller Specific tenancies.

All tenancies are subject to the payment of differential rent.

Dublin City Council will continue to provide or have provided a comprehensive range of on-site and off-site services for Travellers. Such services to include the Social Worker Service, Site Maintenance, Cleansing, and Caretaker Service.

The City Council will continue to engage on all Traveller Issues through the Local Traveller Accommodation Consultative Committee, Inter Agency Groups, National Organisations, Local Advocacy Groups and Traveller Resident Associations.

In accordance with the Housing (Traveller Accommodation) Act, 1998, Local Authorities are required to consider the need for transient facilities. This issue has been discussed at local level with Traveller organisations and at our LTACC meetings. It is the City Council’s view that firstly, transient sites should only be provided following the full provision of the Traveller specific requirement of Travellers indigenous to the Dublin City Council administrative area and secondly, only if there is demand for them. Notwithstanding this, meetings between the four Dublin Local Authorities, which have been ongoing, will continue in order to explore the provision of transient accommodation.

It is Dublin City Council’s policy to provide Traveller Specific accommodation only for the City Council’s indigenous Travelling Community. For this purpose, the City Council will only regard a Traveller household as indigenous where the householder has been resident within the City Council’s administrative area for at least three years immediately prior to the adoption of the City Council’s Traveller Accommodation Programme 2014-2018 or any continuous five year period that an accommodation applicant was previously a tenant of, or resident, in the City Council’s administrative area.

Section 3: Statement of Strategy

Dublin City Council, under the legislative provision, is the implementing authority for the Traveller Accommodation Programme. However, the Council will work collaboratively with all Stakeholders in order to secure success. Aside from individual Travellers, Traveller Families and Traveller advocate groups, such stakeholders will include the HSE, Department of Education, Department of Health and Approved Housing Bodies.

This Programme is based on the premise that there will be available funding with which to bring forward and complete the programme.
Annual targets will be reviewed on an ongoing basis and formally at least every six months to ensure that progress is being maintained. Formal reporting will be from the LTACC to the Housing and Residential Services Strategic Policy Committee. It is proposed to use a template contained in the submission by the Irish Traveller Movement which details objectives, commencement/completion dates and progress report columns. This is detailed in Appendix 3.

Section 4: The Operation of the Local Traveller Accommodation Consultative Committee

The Local Traveller Accommodation Consultative Committee (LTACC) advises the City Council in relation to the provision of accommodation for Travellers, the preparation and implementation of any accommodation programme for our functional area and the management of accommodation for Travellers.

Dublin City Council’s LTACC has been an excellent forum where City Council officials, Councillors, Traveller advocate groups and members of the Travelling Community can discuss Traveller accommodation issues.

The LTACC meets at least four times a year and special meetings along with sub-group meetings are also convened, as required. This will continue to be the case. Where appropriate, sub-groups within the LTACC will be established to discuss specific issues as they arise. An Annual Report is published which details the various activities of the LTACC. Annual targets will be reviewed on an ongoing basis and updates will be provided at meetings of the LTACC.

A review workshop of the City Council’s LTACC’s Terms of Reference was facilitated by the Irish Traveller Movement in September 2013. This is the second such review of the workings of the LTACC following on from a previous one held in 2011. The purpose of these reviews was to consider how the LTACC could work better and all members were able to commit to an improved and agreed set of principles in order to ensure the Committee can work more effectively. The Draft Terms of Reference agreed at the most recent workshop are detailed in Appendix 2.

Section 5: Evaluation of the 2009-2013 Traveller Accommodation Programme

An ambitious new-build target of 118 new houses/units was proposed in Dublin City Council’s Traveller Accommodation Programme 2009-2013. Unfortunately, a serious downturn in the economy resulted in several of the bigger housing schemes which contained Traveller accommodation units not going ahead. Regrettably, some schemes did not advance because of on-site anti-social behaviour and criminality.

5.1 Schemes Delivered

Schemes Delivered in the last Programme:

- One house was built in Avila Close.
Ten houses were extended in Avila Park.

Six houses affected with pyrite were remediated.

23 temporary sanitary units were provided in Labre Park (2011), Cara Park (2010) and Avila Park (2012).

Fourteen day-houses were refurbished in St. Joseph’s Park.

Two houses were refurbished in St. Mary’s Park.

New windows and doors were provided in Avila Gardens and the Cara Estate.

One house was refurbished in Avila Gardens

Two houses were refurbished in the Cara Estate

One special needs extension was completed in Cara Close.

Twenty-five new kitchens were provided under a kitchen replacement scheme.

5.2 Housing Allocations to Traveller applicants

In addition to the proposed new-build programme, it was estimated that 10-15 Traveller Specific units would be provided per year through casual vacancies, while an additional 10-15 units would be provided through Standard Housing allocations.

A total of 116 units of accommodation have been provided through Traveller Specific and Standard Housing allocations between 2009 and 2013, which is almost 93% of our stated target. No single-instance house purchases occurred.

5.3 Introduction of Differential Rent

A Differential Rent Scheme was introduced in March 2011.

Section 6: The Assessment of Needs

6.1 The Assessment of Needs Process

The Assessment of Needs was carried out in September 2013 by the Traveller Accommodation Unit in conjunction with City Council’s Traveller Social Workers and four Traveller advocate groups. The advocate groups were St. Margaret’s Traveller Community Association, Ballyfermot Travellers Action Project, Trav:Act and the Finglas Traveller Development Group.
6.2 The Assessment of Needs Results

There are currently 341 families assessed as being in need of housing in Dublin City Council’s administrative area. Their housing preferences are listed as follows:

<table>
<thead>
<tr>
<th>Summary of Preferences</th>
<th>Number of Families</th>
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</thead>
<tbody>
<tr>
<td>Traveller Group Housing</td>
<td>121</td>
</tr>
<tr>
<td>Traveller Halting Sites</td>
<td>41</td>
</tr>
<tr>
<td>Standard Housing</td>
<td>179</td>
</tr>
<tr>
<td>Total</td>
<td>341</td>
</tr>
</tbody>
</table>

6.3 Projected Demand for Accommodation Types 2014-2018

The following illustrates how the projected demand will be met over the life of the Programme.

6.4 Family Formation

The Assessment also identified that there are currently 136 children who will turn 18 during the lifetime of this Programme. It is not possible to predict the exact impact this will have in terms of future housing needs, but the City Council is satisfied that generally speaking, families are formed between members of families within the Travelling community of local areas. Potentially 68 families may be created but as some of these young families also tend to travel before they settle down, they may not all require housing during this Programme. Therefore, our working assumption is that up to 50 families will require accommodation.
6.5 Proposals to Meet Housing Need

It is intended to meet the housing need through the following methods:

- New builds (33)
- The refurbishment of vacant houses (2)
- The allocation of vacant/illegally occupied bays and houses (11)
- The refurbishment of bays (31)
- Casual Vacancy allocations of approximately 15 per year.
- Standard Housing allocations of approximately 20 per year.
- Private Rented Accommodation

Section 7: Programme Details

Labre Park/Kylemore Grove

Labre Park and Kylemore Grove are located on Kylemore Road in Ballyfermot, Dublin 10.

Current Position

Labre Park is a Traveller group-housing scheme nominally amounting to twenty-two houses while Kylemore Grove contained eight group houses. Since 2009, 7 houses have had to be demolished due to extreme vandalism of these properties in Labre Park while a further three were demolished in Kylemore Grove also due to vandalism. The Community Centre and the Caretaker’s building have also been lost to vandalism.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to phase the redevelopment of Labre Park and Kylemore Grove in three stages.

- Phase 1: The construction of three houses in Kylemore Grove.
- Phase 2: The reconfiguration of the Labre Park estate by the erection of a boundary wall, the removal of any dilapidated structures and the building of one new house.
- Phase 3: The removal of all temporary sanitary units on the left hand side of Labre Park. They will be replaced with eleven new houses and three halting bays.

St. Margaret’s Park

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

A number of years ago, electricity meters were installed in each of the day-houses. However, over time, these meters were bypassed and currently Dublin City Council is responsible for paying the electricity bill for the site which averages between €60,000 and €90,000 per annum. Electricity outages can occur quite frequently in cold weather. In addition, the existing day-houses have not been upgraded since the site was originally opened and need refurbishment.

Proposals under Traveller Accommodation Programme 2014-2018

Dublin City Council intends to upgrade the electrical infrastructure and refurbish the thirty day-houses in St. Margaret’s Park.

The submission from the St. Margaret’s Traveller Community Association called for the provision of a second halting site near to the current St. Margaret’s Park site. The Traveller Accommodation Unit does not currently own any land in the area.

Avila Estate

The Avila Estate located on Cappagh Road, Finglas, Dublin 11 is comprised of three sections totalling forty-nine houses. The sections are: Avila Park (1995), Avila Gardens (2000) and Avila Close (2004).

Current Position

Under the last Programme, one new-build was provided in Avila Close and ten houses were extended in Avila Park in 2009. In Avila Close, a pyrite problem emerged during the lifetime of the Programme which necessitated moving five families out of their homes. Funding was sourced for the remediation of these houses and all families were able to move back in August 2013. One house was substantially damaged in a petrol-bomb attack and this was refurbished in 2013. In addition, one temporary sanitary unit was provided in 2012.

Proposals under Traveller Accommodation Programme 2014-2018

The Community Centre at the entrance to the estate provided a valuable space and amenity to residents. The Centre is currently vacant due to a combination of vandalism and the discovery of pyrite. It is proposed to remediate the Centre. It is also proposed to build a new house on a vacant plot which was formerly 8 Avila Park.

Bridgeview

Bridgeview nominally contains eleven Traveller Specific properties and is located on the Cloverhill Road, Clondalkin, Dublin 22. It was built in 1994.

Current Position

One house was demolished in 2011 due to serious vandalism. There are currently two other vacant properties in need of complete refurbishment. There is also a Community Centre located in the estate which is used by City Council staff and Traveller advocate groups in the area.
Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to refurbish two houses in Bridgeview and rebuild the house that was demolished.

**Tara Lawns**

Tara Lawns is 10 bay halting site located on Belcamp Lane, Coolock, Dublin 17. It was built in 2000.

**Current Position**

Due to the outbreak of a feud in the area, Tara Lawns is currently decommissioned.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to refurbish all ten bays with a view to returning the site to use.

**St. Oliver’s Park**

St. Oliver’s is a fifteen bay halting site located on Cloverhill Road, Clondalkin, Dublin 22. It was built in 1995.

**Current Position**

It was proposed under the last Traveller Accommodation Programme to refurbish the day-houses. However, due to difficulties with the electricity supply where meters were being bypassed, this proposal could not proceed.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to upgrade the day-houses and the electrical infrastructure in St. Oliver’s Park.

**Pigeon House Road**

This site is located in Ringsend, Dublin 4 and was formerly a four bay halting site.

**Current Position**

Under the last Traveller Accommodation, it was proposed to build six houses on this site. However, this project did not proceed for various reasons.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to redevelop this site and build six houses.

**Grand Canal Harbour**

Grand Canal Harbour is a thirteen bay halting site located in James Place, Dublin 2 and was built in 1991.

**Current Position**

A number of bays are unoccupied and in a state of disrepair.
Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to upgrade six day-houses.

St. Mary’s Park

St. Mary’s Park is located on Dunsink Lane, Finglas, Dublin 11 is ten house group-housing scheme built in 1987.

Current Position

Funding was secured to refurbish two houses and these works were completed in February 2013. All ten houses are currently occupied.

Proposals under Traveller Accommodation Programme 2014-2018

There are no major proposals for consideration in this Programme.

St. Joseph’s Park

St. Joseph’s Park on Dunsink Lane, Finglas, Dublin 11, was previously a twenty-eight bay halting site built in 1996.

Current Position

Due to a significant part of the site becoming vacant, a decision was made to divide it in two and reduce the numbers of bays to fourteen. In addition, funding was sought to refurbish the remaining day-houses and these were completed in 2011. There is a Community Centre on site which is in a state of disrepair.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to install individual electricity meters in each bay and refurbish the Community Centre.

Northern Close

Northern Close is a twelve house group-housing scheme located on Belcamp Lane, Coolock, Dublin 17. It was built in 2001.

Current Position

In 2011, one house was illegally demolished so there are currently eleven houses.

Proposals under Traveller Accommodation Programme 2014-2018

It is proposed to rebuild the house that was demolished.

Grove Lane

Grove Lane is located on the Malahide Road, Coolock, Dublin 17. Six group-houses were built in 1989.
**Current Position**

Five houses are in a total state of disrepair and the remaining house is not in use.

**Proposals under Traveller Accommodation Programme 2014-2018**

It is proposed to redevelop this estate. The Traveller Accommodation Unit will also work with the Area Office to develop a plan for the management and upkeep of Grove Lane.

**Cara Estate**

Cara Estate is made up of Cara Park (1986) and Cara Close (2001) and comprises forty-one group houses and is located on Belcamp Lane, Coolock, Dublin 17.

**Current Position**

All forty-one houses are officially occupied with two houses being totally refurbished in the last year while another house was substantially adapted for special needs purposes this year. Thirteen sanitary units were provided in 2011.

**Proposals under Traveller Accommodation Programme 2014-2018**

It is proposed to carry out five extensions to cover special needs and overcrowding requests.

**St. Dominic’s Park**

St. Dominic’s is a twenty-three bay halting site on Belcamp Lane, Coolock, Dublin 17 and was built in 1996.

**Current Position**

The site is currently vacant and in a state of disrepair due to the outbreak of a Traveller feud.

**Proposals under Traveller Accommodation Programme 2014-2018**

It is proposed to refurbish up to 15 day-houses on this site.
### 7.1 Breakdown of Proposals

<table>
<thead>
<tr>
<th>Name/Location</th>
<th>No. of Houses</th>
<th>No. of Bays</th>
<th>No. of Sanitary Units</th>
<th>Proposed Refurbishments</th>
<th>Proposed House Builds</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Current</td>
<td>Original</td>
<td>Current</td>
<td>Original</td>
<td>Houses</td>
</tr>
<tr>
<td>Labre Park</td>
<td>14</td>
<td>22</td>
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<td>0</td>
<td>13</td>
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<tr>
<td>Kylemore Grove</td>
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<td>0</td>
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<td>Pigeon House Road</td>
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<td><strong>61</strong></td>
<td><strong>104</strong></td>
<td><strong>23</strong></td>
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*This includes the building of three halting bays
7.2 Annual Targets

<table>
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<tr>
<th>Accommodation Type</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
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<td>Standard Housing Allocations</td>
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<tr>
<td>Traveller Specific Allocations (Houses &amp; Bays)</td>
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<td>15</td>
<td>15</td>
<td>15</td>
<td>15</td>
<td>75</td>
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<td>Group Housing Refurbishments</td>
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<td>7</td>
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<td>Traveller Halting Bay Refurbishments</td>
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<td>New Builds</td>
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<td>Emergency Facilities</td>
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<td>As required</td>
<td>As required</td>
<td>As required</td>
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</table>

Section 8: Additional Measures

8.1 Caravan Loan Scheme

The City Council in partnership with National Traveller MABS and Exchange House National Traveller Service are continuing to roll out a loan support/guarantee fund to support and facilitate Traveller access to legitimate loans from mainstream institutions for caravan purchase. A number of loans were approved during the course of the previous Traveller Accommodation Plan 2009-2013 and there are a number of loans currently at the pre-approval stage. The fund is open to all halting site tenants and those with permission to reside. Tenants must be in good standing and have a clear rent account. The Loan Committee continue to work with local Credit Unions to support applications for loans.

8.2 Senior Citizen Accommodation

It is proposed to consider the provision of housing specifically for Senior Citizens within the lifetime of this programme. Although life expectancy generally is lower among members of the Traveller Community, age profiles among our tenants is increasing. In some cases, elderly Traveller tenants are living alone in accommodation not suited to their needs. Dublin City Council proposes looking at the potential for developing Senior Citizen accommodation units in some of its estates where there is available land and a demand for same. This would enable the City Council to provide appropriate dwellings to meet the demands of its increasing number of elderly tenants. At the same time it would free up dwellings that could then be allocated to applicants from our Traveller Specific Housing list. Such proposals will only be followed up if there is demand and a willingness from elderly tenants to move into Traveller Specific Senior Citizen accommodation.
8.3 Play Areas

A number of our sites and estates have playground facilities which provide a much needed amenity to our Traveller specific tenants and their children. The Traveller Accommodation Unit will continue to engage with the City Council’s Play facilities staff with a view to enhancing current play facilities and explore the possibility of extending them to other sites and estates.

8.4 Roads and Footpaths

The City Council proposes applying for funding across all of its estates and sites for road and footpath improvement works.

8.5 Homelessness

Some of the submissions received by the City Council made reference to the issue of homelessness among Travellers and contended that certain aspects of the Housing (Miscellaneous Provisions) Act, 2009 were preventing Travellers from being able to access homeless services. We consulted the Dublin Region Homeless Executive (DRHE) and having reviewed the matter, they cannot find any basis for the claim that provisions of Housing (Miscellaneous Provisions) Act, 2009 precludes access to homeless services for Travellers and any person identifying themselves as a member of the Travelling community. All decisions relating to access to homeless services in the Dublin region are determined by an assessment of the person’s need and not their status, and all persons in need of emergency accommodation and who otherwise are at risk of having to sleep rough will be offered accommodation.

8.6 Private Rented Accommodation

As per the Memorandum issued by the Department of the Environment Heritage and Local Government with regard to the preparation and implementation of TAP 2014-2018, alternative housing options including the Rental Accommodation Scheme (RAS) and private rented accommodation should be availed of. Many of the submissions received made reference to the difficulties that Traveller applicants have encountered while attempting to avail of private rented accommodation. It is proposed to establish an LTACC sub-group to examine how those Travellers that may wish to source private rented accommodation can be helped and also to examine how Traveller families in standard social housing and private rented accommodation can be included more in Traveller service provision.

8.7 Anti-Social Behaviour

On 1st November 2010, Dublin City Council formally adopted its Anti-Social Behaviour Strategy in accordance with s.35 of the Housing (Miscellaneous Provisions), Act 2009. The Strategy sets out the Council’s overall plan in dealing with issues of Anti-Social Behaviour and includes objectives, policies, procedures, customer care, Health & Safety and Legislation. Where instances of anti-social behaviour occur, appropriate action will be taken to deal with the tenant or person involved in such behaviour. Sanctions are outlined in the City Council’s Anti-Social Behaviour Strategy and can include the ultimate sanction of eviction. The Traveller Accommodation Unit will explore the possibility of providing a dedicated staff member for Traveller specific sites and estates to deal with these issues.
With regard to offences relating to entering and occupying land without consent, the City Council agrees with the ITM submission that the use of Section 24 of the Housing (Miscellaneous Provisions) Act, 2004 should only be used in exceptional circumstances and that families moved on remain on the waiting list unless accommodated by another housing provider.

8.8 Site Management and Operation

A. Staffing

The Traveller Accommodation Unit is responsible for the provision of Traveller specific services to members of the Travelling Community in the Dublin City Council administrative area. The Unit is responsible for providing a housing advisory service, processing applications for Traveller Specific housing, processing maintenance requests; managing Traveller specific rent accounts as well as assisting Travellers who wish to apply for Standard housing. Staff from the Traveller Accommodation Unit regularly call to each of our halting sites and group housing schemes and provide assistance should any tenants or applicants contact the office.

Social Workers aligned to the Unit host weekly local based clinics, keep in regular contact with tenants and applicants and assist Travellers in relation to housing applications as well as the provision of advice, counselling and support services.

Our Inspector and Supervisors are based primarily on estates and sites and liaise with Travellers, City Council staff from other Departments, as well as our maintenance contractor. In addition, they investigate unofficial encampments and supervise the caretaker service throughout our estates and sites. Caretakers are responsible for general cleaning duties, maintaining communal areas and grass cutting on each of our estates and sites.

B. Payment of Rent

All Traveller specific tenants are liable to pay a Differential Rental charge on their houses and bays. Dublin City Council is aware that sometimes unforeseen circumstance can prevent tenants from keeping their rent payments up to date. Tenants should be aware that the City Council’s Traveller Accommodation Unit (TAU) is there to help tenants when such situations arise. Arrears agreements can be set up by tenants to clear any arrears owed. These agreements can include signing up to the Household Budget system (where rent is deducted from Social Welfare payments) or paying additional amounts with a rent card. Once an arrears agreement is kept to, the TAU will be satisfied that the arrears are being reduced, even it takes a while to clear them completely.

C. Maintenance & Repair Service

Dublin City Council is responsible for repairs associated with the general wear and tear of houses and bays. Where a repair is necessary due to fair wear and tear, the City Council will ensure that this is completed in a reasonable timeframe, which is within twenty-four hours for emergencies and three to five working days for routine repairs. An out of hours emergency maintenance service is provided on weekday evenings, weekends as well as bank and public holidays. During the lifetime of this Programme, it is the City Council’s intention to mainstream the maintenance and repairs service of all our Traveller Specific accommodation to our Standard Housing Maintenance Section.
8.9 New Developments

The City Council will examine its landholding with a view to identifying future sites for development. Where land becomes available, the Traveller Accommodation Unit will bring forward all proposals to the LTACC for discussion.

8.10 Tenant Participation and Estate Management

The Traveller Accommodation Unit welcomes and encourages tenant participation in the management and maintenance of the City Council’s Traveller specific estates and halting sites. It is proposed to form an LTACC sub-group to assist in encouraging greater involvement from tenants. Traveller Accommodation Unit staff meet various residents associations and community groups on site regularly on an informal basis but it is proposed to establish a more formal structure for these meetings to take place.

8.11 Approved Housing Bodies

It is the City Council’s intention to actively engage with Approved Housing Bodies with regard to the future management, maintenance and development of sites and estates.

8.12 Emergency Facilities

It is recognised that ideally all families will be accommodated in accommodation suited to their needs at the earliest time possible. However, there may be a requirement for Emergency Facilities to be provided over the course of the programme for a variety of reasons and all cases will be considered as they arise.
Appendix 1: Submissions on Traveller Accommodation Programme 2014-2018

Statutory Public Consultation Process

A notice appeared on Dublin City Council’s website and an advert was placed in the Irish Times on 22\(^{nd}\) August 2013 and in the Northside People and Southside People on 28\(^{th}\) August 2013 requesting submissions for the City Council’s Traveller Accommodation Programme 2014-2018. Following this statutory consultation process, formal submissions were received from 8 groups:

- Finglas Traveller Development Group
- Ballyfermot Travellers Action Project
- St. Margaret’s Traveller Community Association
- Trav:Act
- Councillor Bríd Smith
- Ard-na-Gréine Residents’ Association
- Irish Traveller Movement
- Dublin City Council LTACC Traveller Advocate Representatives

The Traveller advocate groups were invited to present their submissions at a special LTACC meeting which took place on 3\(^{rd}\) October 2013. Two one-to-one meetings with other individuals/groups who made a submission were held on 3\(^{rd}\) October 2013 and 11\(^{th}\) October 2013.

This Traveller Accommodation Programme takes cognisance of each of these submissions and where possible includes many proposals contained within them. Highlights of the main issues raised within these submissions are contained in this Appendix. The brackets after each statement indicate where DCC’s response is located.

A) Joint Submission from DCC LTACC Traveller Advocate Groups

- The operation and membership of the LTACC. (Section 4)
- That the new TAP is bound by the SMART principles (Smart, Measurable, Achievable, Relevant, Time bound). (Appendix 3)
- The use of Private Rented Accommodation for Social Housing or Traveller Specific Accommodation. (Section 8.6)
- The advocate groups recommended that a scheme of letting priorities based on a points system be used when allocating Traveller specific accommodation. (Section 2 D)
- Provision of Accommodation for Nomadic Families. (Section 2 H)
The advocate groups recommended that Homelessness provision for Traveller needs to be addressed. *(Section 8.5)*

**Traveller Ethnicity. (Section 2 C)**

**Caravan Loans Scheme. (Section 8.1)**

**Tenant Participation and Estate Management. (Section 8.10)**

**Evaluation of DCC Traveller Accommodation Programme 2009-2013. (Section 5)**

The advocate groups recommended that use of Section 24 of the Housing (Miscellaneous Provisions) Act, 2002 should only be used in exceptional circumstances and that families moved on under this legislation should not lose their position on the housing list or be removed from it. *(Section 8.7)*

**B) Submission from St. Margaret’s Traveller Community Association (SMTCA)**

- The need to recognise Traveller Ethnicity. *(Section 2 C)*

  SMTCA stated that there is an overcrowding problem in St. Margaret’s Park and there is need for a second Traveller site in close proximity to the site. *(Section 7 St. Margaret’s Park)*

- SMTCA called for the upgrade of the electrical infrastructure in St. Margaret’s Park and for the refurbishment of the day-houses. *(Section 7 St. Margaret’s Park)*

- Provision for Homelessness. *(Section 8.5)*

**C) Submission from the Irish Traveller Movement (ITM)**

- The operation and membership of the LTACC. *(Section 4)*

- The need for a policy statement indicating a ‘clear commitment to the principle of equality with regard to Travellers and the provision of appropriate accommodation’. *(Section 2 C)*

- That the new TAP is bound by the SMART principles *(Smart, Measurable, Achievable, Relevant, Time bound). (Appendix 3)*

- The use of Private Rented Accommodation for Social Housing or Traveller Specific Accommodation *(Section 8.6)*

- The ITM called for the provision of Accommodation for Nomadic Families. *(Section 2 H)*

- The ITM stated that Homelessness provision needs to be addressed. *(Section 8.5)*

- The ITM called for the introduction of a Caravan Loan Scheme. *(Section 8.1)*

- The ITM highlighted the need for further partnership with the Voluntary Housing Sector. *(Section 8.11)*
The ITM highlighted the need for enhanced and meaningful Tenant Participation and Estate Management. (Section 8.10)

The ITM recommends that use of Section 24 of the Housing (Miscellaneous Provisions) Act, 2009 should only be used in exceptional circumstances and that families moved on under this legislation should not lose their position on the housing list or be removed from it. (Section 8.7)

D) Submission from Ard-na-Gréine Residents’ Association

- Proper enforcement of Planning and Waste regulations is needed at Grove Lane Group Housing Scheme. (Section 7 Grove Lane)
- A plan is needed for the overall management and upkeep of Grove Lane. (Section 7 Grove Lane)

E) Submission from the Ballyfermot Travellers Action Project (BTAP)

- The operation and membership of the LTACC. (Section 4)
- BTAP called for the redevelopment of Labre Park. (Section 7 Labre Park)
- BTAP recommend that further collaboration is required to ensure the inclusion of Traveller families in standard social housing and private rented accommodation. (Section 8.6)
- Emergency facilities need to be provided for those without access to water, sanitation and electricity. (Section 8.12)
- BTAP recommended the upgrade of the day-houses in St. Oliver’s Park. (Section 7 St. Oliver’s Park)
- BTAP stated that a scheme of letting priorities based on points needs to continue to be implemented. (Section 2 D)
- BTAP called for Transient sites to be provided. (Section 2 H)
- BTAP stated that Homelessness provision for Traveller needs to be addressed. (Section 8.5)
- BTAP called for DCC’s Anti-Social Behaviour Strategy to be implemented in Traveller specific accommodation. (Section 8.7)
- BTAP called for a formal recognition of Traveller Ethnicity. (Section 2 C)

F) Submission from the Finglas Traveller Development Group (FTDG)

- The FTDG called for DCC’s Anti-Social Behaviour policies to be implemented where necessary in Traveller specific accommodation. (8.7)
- The Community Centres in St. Joseph’s Park and the Avila Estate need to be refurbished and brought back into operation. (Section 7 St. Joseph’s Park/Avila Estate)
- FTDG called for play areas to be provided in St. Joseph’s Park and the Avila Estate. (Section 8.3)
- FTDG called for the provision of Accommodation for Nomadic Families. (Section 2 H)
- FTDG stated that Homelessness provision for Traveller needs to be addressed. (Section 8.5)
- FTDG called for any actions contained in the TAP to include targets and deadlines against which progress can be measured. (Appendix 3)

G) Submission from Councillor Brid Smith

- Councillor Smith called for a formal recognition of Traveller Ethnicity. (Section 2 C)
- Councillor Smith called for the scheme of letting priorities based on points needs to continue to be implemented. (Section 2 D)
- Councillor Smith stated that emergency facilities need to be provided for those without access to water, sanitation and electricity. (Section 8.12)
- Councillor Smith called for further collaboration with Voluntary Housing Bodies in relation to Labre Park. (Section 8.11)
- Councillor Smith stated that DCC’s Anti-Social Behaviour Strategy to be implemented in Traveller specific accommodation. (Section 8.7)
- Councillor Smith called for a scheme of loans and grants for the purchase of caravans to be introduced. (Section 8.1)

H) Submission from Trav:Act

- Trav:Act stated that there is a need for special needs and overcrowding extensions in five houses in the Cara Estate. (Section 7 Cara Estate)
- Trav:Act called for a plan to be introduced for derelict and run down sites and estates; namely Tara Lawns, St. Dominic’s Park and Grove Lane. (Section 7 Tara Lawns, St. Dominic’s Park, Grove Lane)
- Trav:Act called for additional lands to be provided for Traveller housing to prevent ‘ghettoisation’. (Section 8.9)
- Trav:Act called for DCC to implement policies in relation to dumping, anti-social behaviour, drugs as well as feuding. (8.7)
Appendix 2: DRAFT LTACC Terms of Reference

An introduction to the Terms of Reference:

The terms of reference of Dublin City’s LTACC are to advise the Dublin City Council in relation to:

a) The provision and management of accommodation for Travellers.

b) The preparation and implementation of the accommodation programme for the functional area of Dublin City Council.

c) The management of accommodation for Travellers.

d) To provide a mechanism for transparency and accountability for the delivery of Traveller specific culturally appropriate accommodation.

The Dublin City LTACC is to drive the Traveller housing policy.

It was agreed by the LTACC, that under no circumstances will the LTACC be used as a forum to discuss individual cases.

Frequency of meetings

There will be at least four meetings per year but if issues arise that need urgent attention a meeting will be called.

When and if substructures are set up all members will be informed of when those meetings are to be held.

Attendance

“Where an appropriate Traveller organisation or group of organisations exists or are otherwise available, agree a selection procedure to be administered by such organisation(s).

The appointing local authority should, make adequate resources, including staff, available to service the committee and, having regard to the exigencies of the local authority, should:

• as far as is practicable designate specific staff for this purpose, and

• avoid frequent changes of staff assigned this function.”

Guidelines for the Operation of the LTACC

The LTACC would seek to have two Traveller representatives from each of the local areas: Ballyfermot, Ballymun, Clondalkin(covering St. Oliver’s Park and Bridgeview), Coolock, Finglas (given that Finglas is so vast there may be two from Avilla and two from Dunsink Lane).
The LTACC would seek to have councillors/elected representatives from each of the relevant areas.

A seat is allocated for a representative from the HSPC in addition to the elected representatives nominated by the council. This provides for a reporting mechanism to the HSPC.

All members should make every effort to attend all LTACC meetings. If a member is unable to attend the meeting contact the Chair with apologies. If a member does not attend two consecutive meetings the Chair will contact them to invite them to return or step down from their position so that they can be replaced.

"decide on a quorum for its meetings having regard to the requirements in relation to membership of committees as set out in Section 22 of the Housing (Traveller Accommodation) Act, 1998;" Guidelines for the operation of the LTACC

The city manager will be invited to attend the meeting once a year.

The Director of Housing will be invited to attend the meeting with emphasis given for attendance when setting down targets and reviewing these.

**Minutes**

The minutes are to include the background to decisions and dissension to be recorded along with a timeframe. Minutes will record why something has not been achieved.

The minutes will be sent to the chair within a week of the meeting. Then posted to the Traveller representatives and elected representatives within another week (within two weeks of the meeting)

**Communication and dissemination of information**

Informal/non formal methods of disseminating information from the LTACC will be used by Traveller representatives through Traveller organisations by people calling into centres.

Copies of the minutes of the LTACC meeting will be made available for Travellers.

Copies will be sent to the City Manager and council.

Local groups will bring news from the LTACC to meetings with Travellers in their area.
Connections will be made with, to provide the information to, relevant committees such as the Strategic Housing Policy Committee, Inter-Agency Group. A seat on the LTACC is to be included for a representative on the HSPC as a specific link over and beyond the elected representatives nominated to the LTACC.

Minutes will be uploaded on the Dublin City Council Traveller section website.

**Setting the Agenda**

Standing orders will include:

- Traveller Accommodation Programme based on the monitoring template
- Connections to other committees such as the SHPC and Inter-agency Groups
- Any urgent issues arising that have been communicated to the chair at least 3 working days before the meeting instead of adding “any other business”

The agenda will be sent out to the committee members at least ten working days before to facilitate preparation for the meeting, except the items for the agenda added through the chair as mentioned above.

**Annual Report**

The annual report will be drawn together by a sub-structure of the committee which has at least one council representative, one Traveller representative and one elected representative. A photocopy of the executive summary will be made available to the Traveller community. The full report will be sent to the City Manager and forwarded to the Traveller Accommodation Unit of the Department of the Environment, Community and Local Government.

**Substructures**

Substructures will be used if need arises to develop policies on for presentation at the LTACC so that the delivery of the Traveller Accommodation Programme can be delivered more effectively.

When there is no consensus at the LTACC meeting a sub-group would be set up to discuss the issue, developing proposals for the next meeting.

**Work-plan**

The overall objective of Dublin City’s LTACC will be to ensure that the Traveller Accommodation Programme is implemented.
A monitoring template will be used with the work-plan listing: **Objectives and Target Dates for Delivery of measures contained in the Traveller Accommodation Plan**

**Audit, monitoring and evaluating**

The Traveller Accommodation Programme will be monitored through the use of the template listed above. An audit of delivery will be carried out half way through the programme.

**The Chair**

The chair will be selected from either the public or Traveller representatives. There will be a rotating chair on an annual basis.

**The Role of the Chair**

- Aim to advance the work of the LTACC
- Would not seek to use the chair to forward own agenda
- Allow everyone to participate (speak at least once and monitoring how long people can speak at a time. In small groups will let people talk and will prevent people from talking over each other).
- The Chair is to be formally ratified annually.
- The Chair is to follow up on attendance and any recommendations made at the meeting.
- They are to check the links with the HSPC.
- They are to report into the different structures e.g. council meetings, HSPC representative, other committees and other LTACC elected representatives.
- They are to link with administration in the Traveller Accommodation Unit and issues letters.
### Appendix 3: Sample Template detailing Objectives and Target Dates

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Commencement</th>
<th>Completion</th>
<th>Progress as at the 11th July 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Complete consultation in relation to formal allocation of five Traveller Specific houses</td>
<td>Already Commenced</td>
<td>May 2014</td>
<td>4 Allocations completed – Houses to be handed over the 15th July 2014</td>
</tr>
<tr>
<td>2. Allocate standard housing to Travellers on an ongoing basis</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Standard House Allocations 2014</td>
</tr>
<tr>
<td>Project Allocation over five year period</td>
<td></td>
<td></td>
<td>5 Allocations</td>
</tr>
<tr>
<td>1. 2014 – 10</td>
<td></td>
<td></td>
<td>2 further offers refused</td>
</tr>
<tr>
<td>2. 2015 – 15</td>
<td></td>
<td></td>
<td>2 transfers</td>
</tr>
<tr>
<td>3. Commence design of 2 unit Traveller specific accommodation at?</td>
<td>July 2015</td>
<td>December 2015</td>
<td>Appoint design team end October</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Summit planning April 2016</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Allocate 2 units January 2017</td>
</tr>
<tr>
<td>5. Identify a location for permanent halting site for families requesting same who are currently living at ??? halting site.</td>
<td>April 2015</td>
<td>September 2016</td>
<td>Ongoing</td>
</tr>
<tr>
<td>6. Design and construct five group houses in ???</td>
<td>June 2016</td>
<td>December 2017</td>
<td>Site identified</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Appoint design team end October 2015</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Submit planning April 2016</td>
</tr>
<tr>
<td>7. Refurbishment of ??? halting site</td>
<td>September 2015</td>
<td>March 2016</td>
<td>Departmental approval to proceed tenders received.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Onsite construction to begin October 2015</td>
</tr>
<tr>
<td>8. Commence rental accommodation scheme to facilitate the provision of private rented accommodation for housing applicants including the Traveller community</td>
<td>July 2014</td>
<td>Ongoing</td>
<td>Landlord Seminar held on the</td>
</tr>
<tr>
<td>9. Formulate and deliver tenant training programme specific to the needs of Travellers</td>
<td>June 2015</td>
<td>Ongoing</td>
<td>Liaison between local authority and the local Traveller group in September 2015 to begin formulation</td>
</tr>
<tr>
<td>10. Promotion of the Caravan loan scheme</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>

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1. Source ITM submission to DCC TAP 2014-2018, September 2013
Map of Traveller Specific Group Housing Estates and Halting Sites

- St. Margaret’s Park
- Avila Estate
- St. Mary’s Park
- St. Joseph’s Park
- Cara Estate
- Northern Close
- Grove Lane
- Tara Lawns
- St. Dominic’s Park
- Avila Estate
- St. Joseph’s Park
- Kylemore Grove
- Bridgeview
- Labre Park
- St. Oliver’s Park
- Grand Canal Harbour
- Pigeon House Road

Traveller Group Housing Estates
Traveller Halting Sites

Dublin City Council Boundary Line