



Clare Public Participation Network
Clonroad Business Park
Clonroad
Ennis
Co. Clare
086-1617375

www.clareppn.ie

Clare PPN submission in respect of the review of Clare Traveller Accommodation Programme 2019- 2024

September 1st 2022

Clare Public Participation Network Welcomes this opportunity to make submissions in relation to the review of Clare's Traveller Accommodation Programme 2019- 2024.

Background:

At Clare PPN's Plenary Meeting of November 30th 2017 the member groups of Clare PPN's Social Inclusion College listed provision of support to the Travelling community and securing Traveller's rights in County Clare as some of the key areas they wished their PPN to focus on. This commitment has been re-stated in each successive plenary meeting of the PPN. As part of this work Clare PPN collaborated with Clare Women's Network, Clare Local Development Company, and the HSE's Mid West Traveller Health Unit to obtain funding for the pre-development and establishment of a Traveller Community Development Project in Clare. This project has been established and is in its development phase.

Clare PPN has previously noted with concern that the current Traveller Accommodation Programme was passed without input from the Traveller community in County Clare. As constituted the current TAP

1. Underestimates the need for culturally appropriate Traveller homes in Clare
2. Fails to make provisions to meet the level of need it has itself established
3. Does not designate or identify any specific locations for developments of new Traveller homes.

The National Strategy for Traveller and Roma Inclusion 2017 states the following:

‘There should be adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers. Delivery of Traveller accommodation should be underpinned by a robust monitoring and evaluation framework, with a view to ensuring full expenditure of funds allocated for Traveller specific accommodation.’

The current Traveller Accommodation Programme does not meet the needs of the Traveller Community in Clare, and this when funding is available from national government is a failure in responsibility from the Local Authority. It is a failure to comply with the obligations on public bodies made by the Public Sector Duty, If left unaddressed it will ensure that new generations of Traveller children are born into housing insecurity and that existing Traveller families and individuals will continue to navigate discrimination, overcrowding, evictions and the related poverty, mental distress and barriers to inclusion caused by homelessness and poor accommodation. Communication sent from Clare County Council’s SEO Siobhan McNulty, in 2021 indicated that Travellers represented 50% of those presenting as homeless in Clare whereas they represent less than 1% of the total population. This is four times higher than the national comparable statistics and demonstrates clearly that there is a crisis in housing for the Traveller community in Clare/.¹

Clare PPN considers this lack of provision of Traveller homes and the lack of resourcing of Traveller participation alongside the widespread persistence of discrimination against the Traveller community to be key human rights issues which need to be rectified in Clare.

We call on Clare County Council to resource and support a participative consultation process as detailed in the recent proposal to the LTACC from Clare Traveller CDP, which engages the community in Clare around their current and future housing and accommodation needs. This process can be facilitated through the new Traveller Community Development Project but will require funding and a commitment that Clare Co Co as the housing authority will work collaboratively with the community to achieve their identified aims in the area of providing decent, suitable, well located, and well serviced Traveller homes.

Clare PPN recommends that statistics on the following issues should be gathered from the Travelling Community as part of this process and that policies to address the findings included in the new or amended TAP

- Travellers experiencing over-crowding/forced sharing of accommodation.
- Travellers experiencing homelessness and their experiences of accessing emergency accommodation including bed and breakfasts and hotels.

¹ <https://www.ihrec.ie/discrimination-and-inequality-in-housing-in-ireland>

- Travellers living in culturally inappropriate accommodation due to a lack of provision/poor standard of Traveller Specific Accommodation.
- Travellers living in private rental accommodation which does not meet their needs or has not been inspected.
- Travellers experiences of sourcing private rental accommodation under the current Housing Assistance Payment scheme.
- The projected needs of young Travellers who may be likely to form new families during the life of the plan.
- The particular accommodation needs of Travellers experiencing poor health and of people with disabilities within the Traveller Community.
- The particular and projected needs of ageing Travellers in relation to accommodation

Clare PPN recommends that this review of the Traveller Accommodation Programme and any resultant amendments should consider incorporating both accommodation needs and the wider living environment for Travellers when planning any new developments or when improving or maintaining existing ones. There should be access to services, transport, sufficient spaces for recreation and physical activity and attention paid to ensuring that Travellers have space to live in extended family groupings if they so wish and continue their hobbies, pastimes and trades as well as having access and opportunities to engage in the wider community and access education and employment. In order to address the severe disadvantage which Travellers experience it will be necessary to build secure sustainable culturally supportive living environments in which families, individuals and children can thrive.

At the conclusion of the new consultation process we call on Clare County Council to prepare a new or amended Traveller Accommodation Programme which aims to meet all the identified housing needs of the Traveller Community in Clare- **a programme designed to end Traveller homelessness.**

Following that Clare County Council will need to continue to engage, consult, and respond to circumstances as they develop and to do this it will need to rebuild a strong forum where it engages with the community – if this is to be done through the LTACC, then strengthened methods for ensuring and respecting participation from the community will need to be developed in collaboration with the Traveller Community who have little faith in the LTACC process. We note commentary from the Irish Human Rights Commission in its Equality Review in respect of Traveller Accommodation 2021 of County Clare that Clare County Council should²:

‘Engage with Traveller representative organisations with a view to determining the reasons why members of the Traveller community are reluctant to engage 23 with the Council and stand as representatives of that community on the LTACC. This is of particular concern and a report should be published with reasons for this reluctance and proposed to steps to address those reasons set out.’

² An account of the Equality Review carried out by Clare County Council in respect of Traveller-specific accommodation - IHREC - Irish Human Rights and Equality Commission

Clare PPN further considers that **all** the recommendations made by IHREC’s Equality Review should be taken into account in this review of Clare’s 2019 -2024 TAP, particularly in reference to the adoption of language and criteria in the TAP which narrows or makes conditional Traveller’s access to culturally appropriate homes without any apparent process or legislation to underpin those conditions or provide clarity on how they are established;

*“It is the Council’s policy that, where feasible, the preferred option in terms of the type of accommodation requested will be considered. If this is not possible, other accommodation options may be offered to individual households. If this reasonable accommodation offer is refused, without good reason, their housing application may be given a reduced priority in line with statutory provisions”.*³

Clare PPN notes the following from Office of the Planning Regulator in regard to Clare’s Draft County Development Plan:

*4.1 Traveller accommodation Section 5.2 of the draft Plan includes relevant policies from the housing strategy addressing specialised housing requirements, including those of the Traveller community (CDP5.10). The Office welcomes the commitment to provide appropriate housing accommodation for the Traveller Community in accordance with the Clare County Traveller Accommodation Programme 2019-2024 (TAP), and to the addressing of Traveller Accommodation in the Housing Strategy. It is noted, however that the TAP does not specifically identify a need for transient halting sites and that accommodation will be provided only in the form of standard[1]type housing. **Accordingly, no objectives are included in the draft Plan to provide specific accommodation to reflect the specific cultural preferences of Travellers. The Office notes that no particular areas have been identified for the purpose of providing accommodation for travellers as required by 10(2)(i), notwithstanding that the TAP states that 12 families are accommodated on halting sites and 12 other families reside on unauthorised sites.** The TPA also recognises that the provision of transient accommodation must be pursued, albeit on a national / regional basis, as part of a coordinated network of sites throughout the country. The planning authority’s attention is drawn to examples of good practice identified in the OPR’s recent Case Study Paper on this subject matter. 25 | Page Recommendation 10 - Traveller Accommodation Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, (as amended), the planning authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose in accordance with the legislative requirements under section 10(2)(i) of the Act. This will include the identification of specific locations in the land use zoning maps for the county, including existing and proposed accommodations.*

³ As above

And in the light of the above we consider that the Current TAP needs to be amended with specific areas and projects identified zoned for the provision of culturally appropriate Traveller accommodation in the county. This should be done following the consultation process called for in this submission and detailed within the proposal sent to the LTACC from Clare Traveller Community Development Project. Clare PPN calls on Clare County Council in its County Development Plan to zone and plan sufficient developments of all forms of Traveller Specific and general accommodation to meet Travellers' needs and to immediately begin the process of applying for planning permission and funding for their completion

Living Environment:

Clare PPN recommends that this review of the Traveller Accommodation Programme and any resultant amendments should consider incorporating both accommodation needs and the wider living environment for Travellers when planning any new developments or when improving or maintaining existing ones. There should be access to services, transport, sufficient spaces for recreation and physical activity and attention paid to ensuring that Travellers have space to live in extended family groupings if they so wish and continue their hobbies, pastimes and trades as well as having access and opportunities to engage in the wider community and access education and employment. In order to address the severe disadvantage which Travellers experience it will be necessary to build secure sustainable culturally supportive living environments in which families, individuals and children can thrive.

Clare PPN looks forward to continuing to engage in this process and welcomes any communications or queries in respect of this submission.

Yours Sincerely,
Mary O'Donoghue
On behalf of Clare PPN

Any queries in relation to this submission can be directed to Sarah Clancy, Clare PPN Coordinator, for the attention of the Secretariat of Clare PPN:

Email: sarah@clareppn.ie
Tel: 087-1617375