



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

www.clareppn.ie

September 26th, 2024

Clare PPN submission in respect of the Draft Traveller Accommodation Programme 2025 – 2029

Clare Public Participation Network welcomes this opportunity to make this brief submission in relation to the Draft Traveller Accommodation Programme.

We welcome and commend the collaborative peer research project on Traveller Accommodation Needs carried out by Clare Traveller Community Development Project, CENA and supported by Clare County Council. This was a groundbreaking pilot project which has the potential to lead to new and constructive relationships between the Traveller community and their Local Authority.

We are concerned however **not to see a full reflection of the project's findings or recommendations** within this Draft Traveller Accommodation Programme (TAP) and request that Clare County Council takes the time to fully consider and incorporate the findings and recommendations in this TAP. We recommend the inclusion of the figures and household numbers established by that research within this TAP and the revision upwards of current and future accommodation needs to reflect the higher numbers of Traveller households identified in Clare.

We recommend that within this TAP, Clare County Council **seeks to address and remedy the high levels of homelessness, housing insecurity, and overcrowding within the Traveller community** in Clare whilst also making provision for future growing need as indicated by the high percentage of those within the community who are at, or will reach an age at which family formation is likely, during the life cycle of this programme.

As previously noted in earlier submissions we continue to be concerned by the failure to zone land for the development of Traveller Accommodation in Clare. This concern was also raised by the Office of the Planning Regulator in relation to Clare's Draft County Development Plan – as follows:

'4.1 Traveller accommodation Section ... '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 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’

Clare PPN are extremely concerned to see at various points in this programme whole speculative paragraphs regarding why Council staff feel Travellers are requesting or availing of certain services. This reads extremely unprofessionally and can easily be perceived as discriminatory. Such text has no place in a Traveller Accommodation Programme. **On the basis of this we request that the entire document is ‘human rights and equality- proofed before publication and adoption.** We note that similar concerns were raised in relation to Clare’s previous TAP by the Irish Human Rights and Equality Commission. Clare PPN is happy to assist in engaging someone with expertise in this field if this is considered helpful. We draw your attention in particular to PG 16/17, 5.5 ‘Homelessness’ and strongly suggest the complete removal of the last three paragraphs under this heading.

We request that Clare County Council remove the paragraphs relating to:

1. Anti Social Behaviour (PG 15, 5.4) Remove the entire last paragraph, it has no place in a Traveller Accommodation Programme.
2. The Council’s Policy on Horse Ownership (PG 7, 3.1 bullet point 6) These clauses are more properly inserted in tenancy agreements for particular properties rather than an overall programme of accommodation development and their generalised inclusion in this TAP can be read as discriminatory. Further to that, at a national level funds **are allocated** to ensure the availability of culturally appropriate accommodation for the Traveller community in order to address their needs. Culturally appropriate accommodation can and is widely understood to mean accommodation which meets and allows for the carrying on of cultural traditions, lifestyles and enterprises. We consider it pre-emptive and arbitrary for Clare County Council to exclude from the outset the possibility of the development of, or the purchase of Traveller Homes that include provisions for Traveller cultural traditions and pursuits.
3. Clare PPN strongly calls for the **removal** of the so-called ‘Indigenous Clause’ (Pg 6, 3.1 bullet point 1) **as this has no basis in law** and is not a condition of application for funds for the construction or purchase of Traveller Specific Accommodation.
4. Clare PPN calls for **either** the removal of the clause or the inclusion of a firm agreed definition of what a ‘reasonable offer of accommodation’ consists of and what a ‘good reasons’ for refusal might be. (PG6, 3.1 bullet point 3)
5. Clare PPN equally calls for the reversal of Clare County Council’s policy on Single instance housing (as outlined on PG 6, 3.1 bullet point 4.) which seeks to minimise the use of such properties. Clare PPN considers that from the findings of the research report such housing will be a valuable method for meeting some of the needs of the Traveller community and that Clare

County Council should indicate its willingness to use all available options to improve the accommodation standards and housing security for the Traveller community. Where funding IS available for such purchases Clare County Council should make full use of it.

6. Clare PPN notes with concern an apparent intention by Clare County Council **not to renovate or repair vacant homes** on group housing schemes until a need is identified for them. This is an extremely poor policy with the capacity to negatively impact the living environment and well being of those nearby who have a right to a safe and dignified home. We call on Clare County Council to commit within this TAP to carrying out repairs and maintenance of all houses on group schemes and bays on sites to a safe and presentable standard that will ensure a positive living environment for those who live alongside. Maintaining houses in good order is also likely to impact positively on vacancy rates.

7. Living Environment:

Clare PPN recommends Traveller Accommodation Programme 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.

8. In conclusion we would like to thank Clare Traveller CDP, CENA and the Peer- Researchers for their invaluable work on the Needs Analysis, and we request that this Traveller Accommodation Programme includes both the data and the findings from that valuable project and seeks to address the recommendations included in the report. We call on Clare County Council to make a commitment to realise the human rights of Traveller in Clare in respect of access to decent, secure, culturally appropriate homes.

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

Yours Sincerely,
Sarah Clancy
Clare PPN Coordinator

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