

Traveller Accommodation Programme 2019-2024

Draft Mid Term Review September 2022

Background

The (Traveller Accommodation) Act, 1998 requires Local Authorities to prepare and adopt a 5 year programme, for the provision of Traveller Accommodation in their area. The current Traveller Accommodation Programme 2019 – 2024 (TAP) is the fifth plan to be adopted by Galway City Council since 1998. Prior to the adoption of TAP 2019-2024 in July 2019, extensive consultations with the Local Traveller Accommodation Consultative Committee (LTACC), local and national Traveller organisations and the general public was conducted in line with the requirements of the Act.

Section 17(1)(a) of the Housing (Traveller Accommodation) Act, 1998, provides that a relevant housing authority shall review its TAP at least once in each three year period, or at such time as directed by the Minister. Circular 28/2022 of the 6th July 2022 advised that local authorities are directed to commence a mid-term review of the current TAPs to be carried out no later than 31 August 2022. Subsequent notification permits a later date to be considered to facilitate consultation.

Review Process

Traveller Accommodation Programme 2019-2024 was adopted by Council on 8th July 2019. Before the Plan was adopted, consultation with the general public, local Traveller representative support group and Councillors took place as part of the plan preparation process. As part of the mid-term review process, returns from the Housing Needs Assessment (HNA) in 2021 and Traveller Census 2021 data have informed the analysis of current accommodation needs of Traveller households in the city.

Adjoining local authorities and relevant local statutory and non-statutory agencies, local Traveller representative support groups were notified of the commencement of the mid-term review and submissions and observations were sought by the 19th August.

Submissions Received

Galway City Council notified all parties who were invited to make a submission to the drafting of TAP 2019 – 2024 to submit any comments or observations to be considered as part of this review. (Appendix 2)

A submission was received from Galway Traveller Movement. A number of the issues raised in the GTM submission are addressed throughout this review and will be further addressed as part of the development of the Traveller Accommodation Estate Management Strategy and in the Assessment of Equality and Human Rights issues review underway.

A submission was received from the Irish Traveller Movement included recommendations in relation to community consultation, assessment of need, reducing reliance on the private rented sector and noting the importance to linking TAP's to City Development Plans.

Current status of Traveller Accommodation and need

Information in the table below was gather from the Annual Estimate of Traveller Families and their Accommodation Needs (census) 2021, and then further updated to reflect current position.

Accommodation Type	No of Households
Standard LA Lettings	264
LA Group Houses	22
Families living in houses acquired or improved with the assistance of LA	13
Families living in houses acquired by Travellers without LA assistance (estimate)	3
Private Rented accommodation (incl HAP, rent supplement, RAS, LTL)	163
Approved Housing Body	63
Supported Projects	12
Sharing in Standard Lettings	37
Sharing in Group Houses	6
Sharing in Private Rented Accommodation	10
Sharing in Voluntary Housing	1
Permanent Halting Sites	23
Temporary Halting Site	13
Transient Sites	20
Sharing on Permanent Halting Sites	13
Families on Unauthorised Sites	8
Total number of Traveller families in the LA area	671

Accommodation Targets - TAP 2019 – 2024

Accommodation Type	2020	2021	2022	2023	2024	Total
Standard Local Authority (incl Transfers)	10	10	10	10	10	50
AHB standard housing	10	10	5	5	0	30
Extensions to Standard Local Authority	1	1	1	1	1	5
Group Housing Scheme (LA and AHB)	0	10 (2 schemes)	0	0	5 (1 scheme)	15
Culturally Specific Traveller Accommodation	5 (1 scheme)	20 (3 schemes)	0	0	0	25
Permanent Residential Halting Site	2	1	1	1	2	7
Rental Accommodation Scheme (RAS)	1	1	1	1	1	5
Long-Term Leasing Scheme	1	1	1	1	1	5
Housing Assistance Payment (HAP)	20	20	20	20	20	100
Total	50	74	39	39	40	242

Section 6 of the 1998 Act (as amended of the Housing (Miscellaneous Provisions) Act 2009) requires housing authorities, for the purposes of preparing a Programme, in respect of their functional area, to make an assessment of the accommodation needs of Travellers who are assessed under Section 20 of the Housing (Miscellaneous Provisions) Act 2009 as being qualified for social housing support, including the need for sites. In making an assessment, a housing authority is required to have regard to the estimate of the number of Travellers for whom accommodation will be required during the course of the programme and the summary of social housing assessments prepared under section 21 (c) of the Housing (Miscellaneous Provisions) Act 2009 as it relates to Travellers.

The accommodation targets agreed under TAP 2019 – 2024 are set out below. Overall, **242** accommodation supports were proposed over the 5 year term of the Programme, broken down by anticipated year of delivery and by accommodation category.

Accommodation Delivery by Year / Category to date

Accommodation Type	2020	2021	2022	2023	2024	Total to date	Overall target
Standard Local Authority (incl Transfers)	31	17	11	-	-	59	50
AHB standard housing	10	14	15	-	-	39	30
Extensions to Standard Local Authority	3	0	0	-	-	3	5
Group Housing Scheme (LA and AHB)	0	0	0	-	-	0	15
Culturally Specific Traveller Accommodation	0	0	0	-	-	0	25
Permanent Residential Halting Site	5	2	0	-	-	7	7
Rental Accommodation Scheme (RAS)	0	0	0	-	-	0	5
Long-Term Leasing Scheme	0	0	0	-	-	0	5
Housing Assistance Payment (HAP)	14	11	1	-	-	26	100
Total	63	44	27			134	242

Delivery of accommodation supports over the 3 year period of the Programme to June 2022 has been **134** housing supports against an overall target for that period of 163 individual accommodation supports representing a delivery against target of 82%. After year 3 of the programme, 55% of overall targets have been achieved. As outlined in the table above, delivery of standard Local Authority and Approved Housing Body homes is in excess of what was initially planned and by year 3 of the 5 year programme the overall target for those two categories has been exceeded.

The delivery of Culturally Specific Traveller Accommodation and Group Housing Scheme (LA and AHB) homes has been delayed and details of same are outlined in the table below. Reasons for delay include

prolonged planning process, Impact of Covid 19, delays with land acquisition and individual site constraints impacting on site availability. It is anticipated that developments at Kerraun, Headford Road, Circular Road and Doughiska will be either completed or well advanced within the timeframe of this TAP to mid-2024. Proposals to develop Traveller Specific homes at Merlin and the redevelopment of Fana Glas will not be completed within the TAP timelines.

The Council will also commence consultation with families on the 5 bay Doughiska halting site in 2022 on plans for refurbishment of the site (similar to the proposals for Circular Road) to be included in the next TAP from 2024 to 2029.

The anticipated supply of homes in the private market has been significantly impacted by lack of supply since 2021. In the first year of the programme 14 families secured accommodation through the HAP scheme, falling to 1 family in year 3. The anticipated number of families to secure HAP tenancies over the period 2019 – 2024 was 20 each year, or 100 over the 5 year TAP period. By year 3, only 26 Traveller families secured HAP tenancies reflecting the overall shortage of rental accommodation generally in the city and the further difficulties Traveller families face securing accommodation in the private rented sector. Similarly, no units of accommodation were secured for families in RAS / Long-term leasing.

Capital Programme Current Status

The table below provides an overview of progress in relation to the capital schemes noted in TAP 2019 – 2024. Further details of the schemes is provided in Appendix 1. A combined sum of **€7,780,346** has been agreed for the provision of Traveller accommodation under the schemes below.

	Location	Update
8 Culturally Specific Traveller Units	Keeraun	Stage 2 approval received. Part 10 planning publication September 2021. Additional surveys required. Decision anticipated Q4 2022. On site Q2 2023. €3,692,698 approved at Stage 2.
4 Culturally Specific Traveller Units	Doughiska	CAS/CALF Funding approved. Part 8 publication delayed pending clarity on timeframes for knotweed removal – projected Part 8 publication Q4 2022. On site Q2 2023. Respond - €1,278,376 approved at Stage 1
5 Culturally Specific Traveller Units	Circular Road	Stage 2 approval received January 2021. Part 8 approved June 2022. On site Q1 2023. Decanting of site will be required. GCC in partnership with CENA. Funding of €1,673,862 approved at Stage 2. (redesign of existing halting site)
3 Culturally Specific Traveller Units	Headford Road	Stage 2 approval for 21 homes and 3 Traveller specific homes April '22. Part X planning published June 2022. Pending ABP approval, procure contractor, commence on site in Q1 2023. Funding of €1,135,410 approved at Stage 2
8 Culturally Specific Traveller Units	Merlin Lands	Prelim design stage. Stage 1 application pending. Additional adjacent lands to be acquired 2022. Engagement with GCC planners re proposed development ongoing. Will not be completed by 2024 and will be noted for delivery in the next TAP.
8 Unit Group Scheme	Fana Glas Ballybane	Wider housing proposal for the area being considered. Submission seeking DHLGH funding approval in 2022. Will not be completed by 2024 and will be noted for delivery in the next TAP.

Future proposals: Preliminary proposals are being considered for the redevelopment of the existing Doughiska halting site and replacement with group / Traveller specific homes similar to plans agreed for Circular Road. Potential for 5 units to be included in the next TAP for delivery. Consultation with residents will be required in advance of design team engagement and will commence in Q4 2022.

Additional lands have been acquired by Council in 2022 and an element of Traveller specific homes will be incorporated into the initial and preliminary designs to be prepared in 2022.

Accommodation Targets for the Remainder of the Plan 2023 – 2024

Accommodation Type	2020	2021	2022	2023	2024	Total
Standard Local Authority (incl Transfers)	-	-	-	10	10	50
AHB standard housing	-	-	-	5	0	30
Extensions to Standard Local Authority	-	-	-	1	1	5
Group Housing Scheme (LA and AHB)	-	-	-	0	5 (1 scheme)	15
Culturally Specific Traveller Accommodation	-	-	-	0	0	25
Permanent Residential Halting Site	-	-	-	1	2	7
Rental Accommodation Scheme (RAS)	-	-	-	1	1	5
Long-Term Leasing Scheme	-	-	-	1	1	5
Housing Assistance Payment (HAP)	-	-	-	20	20	100
Total	50	74	39	39	40	242

Delivery targets agreed for the final two years of TAP 2019 – 2024 are outlined above, 39 for 2023 and 40 for 2024. It is likely and probable that there will be a higher number of allocations to Standard LA and AHB housing than anticipated above, and a lower number of HAP allocations than that anticipated when the Programme was agreed in 2019. However, it is not intended to amend the overall delivery target of 39 accommodation supports in 2023 and 40 in 2024.

The overall delivery target of 242 accommodation supports anticipated over the 5 year TAP to 2024 is not being amended. With 134 housing supports delivered to date, 108 units are required over the coming two years to reach the target of 242. These units will be delivered through a combination of LA standard and AHB standard and the completion of the capital schemes at Kerraun, Headford Road, Doughiska and Circular Road.

Collaborative Working and Monitoring of TAP delivery

Galway City Council have committed to working in a collaborative and transparent way with Galway Traveller Movement and/or other Traveller representative organisations to advance TAP 2019-2024. Two sub-groups of the Local Traveller Accommodation Consultative Committee (LTACC) have been established focused on Operations, including new capital schemes, and Estate Management, focused on management and maintenance of existing Traveller specific homes in halting sites and group housing across the city. Both of these sub-groups meet 4 times each year and a range of issues are discussed and agreed.

A progress report is provided to the LTACC at each quarterly meeting noting updates on the capital programme including any significant refurbishment and site specific maintenance works together with updates from the two sub-groups.

The Council will also work with Traveller families to ensure that policies governing estate management are adhered to, any fire safety concerns are dealt with, and to ensure the active participation of Traveller families and organisations in the management of sites. A Traveller Specific Estate Management Strategy will be developed in Q4 2022 and a consultant has been engaged to commence the drafting of same. The Strategy will be first of its kind in the country and will provide a road-map for the active management of Traveller accommodation across the city on a partnership basis between the Council, families, Traveller organisations and support groups.

IHREC Equality Review Recommendations

In 2021, the Irish Human Rights and Equality Commission (IHREC) completed an equality review pursuant to section 32(1) of the Irish Human Rights and Equality Commission Act 2014 in relation to the Council's delivery of Traveller accommodation and issues concerning the drawdown of funding in respect of same.

The Commission invited the Council to undertake an audit of the level of equality of opportunity and/or discrimination that exists in relation to members of the Traveller community who wish to avail of Traveller specific accommodation having regard to the drawdown by the Council of capital funding provided by the Department of Housing, for the provision of Traveller specific accommodation and having regard to the Council's obligations under the Equal Status Act 2000-2015. The Council were also requested to conduct a review of its practices, procedures, and other relevant factors in relation to the drawdown of capital funding and the provision of Traveller specific accommodation services to Travellers to determine whether those practices, procedures and other relevant factors are conducive to the promotion of equality of opportunity for these service users having regard to the Council's obligations under the ESA.

A number of recommendations in the IHREC review have been implemented to date and it was agreed that other recommendations would be considered as part of the TAP Mid-Term Review.

Caravan Loan Scheme: Galway City Council will implement the Pilot Caravan Loan Scheme as per Circular 31/2022 received on the 18th of July, 2022. Notification to members of the LTACC and Traveller reps has issued advising that Council will accept applications for caravan loans subject to its terms and conditions.

Communications Protocol: Galway City Council has an agreed Communications Protocol which underpins the work of the LTACC. This Protocol will be further strengthened as an equality statement as part of the actions carried out to inform the mid-term review of the TAP.

Traveller Accommodation Unit: Galway City Council will submit a proposal to the Traveller Unit in the Department of Housing to establish a Traveller Accommodation Unit. This will ideally comprise of a Traveller Accommodation Officer and a Traveller Liaison Officer who will work within the wider Estate Management Team to work specifically with Traveller tenants.

Traveller ethnicity: The TAP Mid-Term Review will consider the manner in which recognition is given to Traveller ethnicity and respecting Traveller culture and identity in the provision of services to Travellers as recommended by IHREC. Further work will be done to advance this in the areas of Traveller homelessness and estate management. This work will be supported by the inclusion of the Traveller ethnicity identifier in the Galway City Council social housing application form and subject to the availability of the Traveller Liaison Officer in 2023, it will be a core duty to ensure that all Traveller households are supported to register their housing need and indicate their preferences. Galway City Council will also continue to facilitate ongoing consultation and dialogue with Traveller households and advocacy groups at local and national level in relation to accommodation preferences, for example the previous consultation workshops undertaken in conjunction with Cena in this regard.

Transient site/bays: Galway City Council have considered the provision of additional transient site/bays in the context of this Mid-Term Review, however there are no plans in the current TAP to develop a new or additional transient halting site in Galway city.

Estate Management: Galway City Council have commenced a review its Estate Management Strategy alongside the development of a Traveller Specific Strategy to ensure the actions arising from both strategies support and sustain integrated communities in response to IHREC recommendations.

Traveller Homeless: A multi-agency cross sectoral working group has been set up to review homelessness and Traveller families, given the high numbers of Traveller families in emergency accommodation, as a response to the recommendation for an extension of Galway City Council's approach to cultural difference in the provision of homeless services.

Human Rights and Equality: Galway City Council will undertake an assessment of human rights and equality issues as part of this Mid-Term Review in line with the recommendation from IHREC. Galway City Council will ensure that the issues identified are being addressed adequately.

Expenditure Review: Review of expenditure and draw down for Traveller specific accommodation was undertaken as part of this Mid-Term Review further to recommendation by IHREC. Each LTACC meeting is provided with an update on capital expenditure and funds received from the Traveller Accommodation Unit. A yearly progress report is also prepared for the LTACC detailing the level of drawdown from the TAU on the various schemes and initiatives completed.

Appendix 1 – Capital Programme Schemes in Progress September 2022

Kerraun - Social Housing Scheme / 8 Culturally Appropriate Traveller Homes

Notice of the proposed development at Keeraun, Ballymoneen Road was published on the 2nd September 2021 pursuant to the requirements of Section 177AE(4)(a) of the Planning and Development Act 2000 (as amended) advising that Galway City Council proposes to seek approval from An Bord Pleanála to carry out the development at Keeraun. The application consists of a social housing development of 71no. units comprising – 4no. 1-bedroom units, 34no. 2-bedroom units, 22no. 3-bedroom units, 3no. 4-bedroom units, and 8no. TAA (Traveller Appropriate Accommodation) units.



A Natura Impact Statement was prepared in respect of the proposed development. An Environmental Impact Assessment Screening Report has been undertaken in respect of the proposed development and concluded that an Environmental Impact Assessment Report is not required. An Bord Pleanála may give approval for the development with or without conditions or may refuse the application for development. Plans and particulars of the proposed development were available for inspection from Monday 6th September 2021 to Monday 18th October 2021. €3,692,698.31 has been approved at Stage 2 in respect of the 8 Traveller homes and a planning decision is anticipated in Q4 2022 with construction to commence in Q2 2023.

Doughiska - Social Housing Scheme / 4 Culturally Specific Traveller Units

This development is being brought forward as a collaborative approach between Galway City Council and Respond Housing Association. CAS Funding is approved with Respond for €1,278,376 at Stage 1 for 4 Traveller Homes as part of a larger scheme of 23 units overall. The Part 8 publication has been delayed pending clarity on timeframes for knotweed and illegal waste removal on site. The projected Part 8 publication is Q4 2022 and subject to approval construction should commence Q4 2023.



Circular Road - 5 Culturally Specific Traveller Units

Part 8 planning notice was published on the 10th February 2022 for the redevelopment of the Circular Road Halting site. The scheme will include 5 units of Traveller Group Housing to replace the existing halting site bays, comprising 1 x 2 Bed, 3 x 3 Bed and 1 x 4 Bed homes. The scheme is being developed as a collaborative effort between Galway City Council and Cena. It is anticipated that Cena will take over the management role of the development post completion. Part 8 planning was approved in June 2022 with the Stage 3 application to be submitted in Q4. Subject to Stage 3 and 4 approval the scheme will commence construction in Q1 2023 and decanting of the site will be required for the duration of the works. Funding of €1,673,862.68 was approved at Stage 2.



Headford Road – 3 Culturally Specific Traveller Units

Galway City Council propose to construct 24no. new dwellings, consisting of 3no. houses and 21no. apartments, at Headford Rd., Galway. The proposed houses are a mixture of two- and three-story buildings. Pursuant to the requirements of Section 177AE(4)(a) of the Planning and Development Act 2000 (as amended) Galway City Council has sought approval from An Bord Pleanála to carry out the development at Headford Road to construct a social housing development of 24 no residential units, comprising – 3 no. 1-bedroom units, 14 no. 2-bedroom units, 4 no. 3-bedroom units and 3 no. 4-bedroom (Traveller Appropriate Accommodation) units. The Part X planning application was published on the 2nd June 2022. The Traveller appropriate accommodation element of the project has been informed by consultation between the Housing Department and Traveller representatives.



A Natura Impact Statement has been prepared in respect of the proposed development which triggered the requirement to make the planning application to An Bord Pleanála rather than as a Part 8. An Environmental Impact Assessment Screening Report was undertaken in respect of the proposed development and concluded that an Environmental Impact Assessment Report is not required. An Bord Pleanála may give approval for the development with or without conditions or may refuse the application for development.

Plans and particulars of the proposed development together with the Natura Impact Statement and Environmental Impact Assessment Screening Report were available for inspection from Monday 30th May 2022 to Monday 11th July 2022. Funding of €1,135,410.50 was approved at Stage 2 on 28th April 2022 for the Traveller Appropriate Accommodation (3 no. Units).

Merlin Lands - 8 Culturally Specific Traveller Units

Proposals to develop Traveller appropriate homes at Merlin are at preliminary design stage with a Stage 1 application pending in Q4 2022. Additional lands are being acquired adjacent to lands purchased in 2018. Traveller homes will not be completed by 2024 and will be noted for delivery in the next TAP. The lands will be developed, subject to planning and funding approval to also include social and affordable housing on the overall site. It is anticipated that 8 Culturally Specific Traveller Units will be developed on the lands in 2025.

Fana Glas, Ballybane - 8 Unit Group Scheme

Proposals for the redevelopment of the existing Fana Glas Group Housing Scheme have been delayed and Council are considering the wider housing needs of the area. It is anticipated that a Stage 1 application will be submitted to the Department of Housing in Q2 2023 for the redevelopment of the existing scheme and replacement with a new more appropriate form of accommodation for up to 8 families.