

Stakeholder Consultation on “Housing for All” Policy Statement and Action Plan

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Introduction

The State recognises that an output of approximately 33,000 new homes per annum will be needed each year from 2021 to 2030. In order to achieve that, we need delivery across all tenures, including social, affordable, rental and private housing. The Government will seek to address challenges in the sector, including viability, access to finance, land availability, the delivery of infrastructure, building quality, building standards and regulation, and an adequate supply of skilled labour.

A key mission outlined in the [Programme for Government](#) is the delivery of a new plan for housing which will be called ‘Housing for All’. It is Government policy that everybody should have access to good-quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering a high quality of life. The provision of more housing across all tenure types has a profound benefit socially and economically and the State has a fundamental role in enabling the delivery of new homes and ensuring that best use is made of existing stock.

There have been large increases in the building of new homes over the past four years. However, far more homes are needed. While the COVID-19 crisis has presented challenges in maintaining the level of growth, the Government will work with the construction sector to ensure that the number of new build homes continues to grow in the years ahead.

Over the next four years the Programme for Government commits to:

- Put affordability at the heart of the housing system.
- Prioritise the increased supply of public, social, and affordable homes.
- Progress a state-backed affordable home purchase scheme to promote home ownership.
- Increase the social housing stock by more than 50,000, with an emphasis on new builds.
- Tackle homelessness.
- Ensure that local authorities are central to delivering housing.
- Work with the private sector to ensure that an appropriate mix and type of housing is provided nationally.
- Improve the supply and affordability of rental accommodation and the security of tenure for renters.

The new policy statement and action plan, “Housing for All”, is now being developed on a Whole of Government basis. As part of this work to develop Housing for All, we would like to hear from a wide range of expert stakeholders to gather thoughts and ideas on improving the delivery of housing in Ireland.

Guide to Completing the Survey

The consultation period will run **until 4 May 2021**. Any submissions received after this date may not be considered.

In responding to this consultation you are invited to:

- Give your organisations views on the specific questions set out below. You do not have to answer every question – you may choose to answer all of the questions or only those which are relevant to you. You can provide additional information by way of electronic link or attachment.
- Provide details of any issues or concerns you feel should be considered in dealing with the particular topic being addressed in your response.

Survey Questions

1. Name of Organisation:

Irish Traveller Movement

2. Briefly describe your organisation?

300 character(s) maximum

Member-led national advocacy platform, founded in 1990. Network of over 40 local Traveller organisations. Working from community development principles, we develop collective policies on issues faced by Travellers across Ireland and represent Traveller interests in national governmental spaces.

3. Having regard to the housing objectives set out in the [Programme for Government](#), what other key objectives should be considered? How should these objectives be prioritised?

3000 character(s) maximum

The Programme for Government commits elsewhere to ensuring “that the housing needs of the Traveller Community are met by local authorities and ensure that existing funding is fully drawn down and utilised” (p. 77), with no outline of how this will be achieved under Housing for All. A significant way that this can be achieved is through the implementation of all 32 recommendations of the Expert Review. Budgets, priorities and corresponding timelines for the implementation of each of the recommendations should be described in the Housing for All action plan as a priority; reflecting the decisions already made by the Expert Review Programme Board. The implementation should be grounded in Traveller consultation and representation.

Include enumerated targets for Traveller-specific accommodation, in the commitment to increase the social housing stock by more than 50,000. The emphasis should be on new builds. The Expert Review found that 54.1% of output between 2006 and 2018 involved the refurbishment of existing Traveller specific units rather

than new output.

Any future moratorium on the termination of tenancies should include Travellers living on unofficial sites, as per the original wording of The Emergency Measures in the Public Interest (Covid-19) Act 2020.

Section 24 of the Housing (Miscellaneous Provisions) Act 2002 which prohibits nomadism, a core element of Traveller culture, should be repealed. Current eviction procedures should be reviewed and an appeals process introduced, to remedy Ireland's breach of the European Social Charter, and reduce the trauma inflicted on Travellers by eviction procedures.

The national rollout of the new preferential caravan loan scheme, post-pilot, should be set out in the strategy with a budget and timeline in place, ensuring residential standard mobiles are supplied to Travellers who wish to avail of the scheme.

Percentage allocations for Traveller-specific accommodation should be included in the Land Development Agency, the National Development Plan, and in the City and County Plans.

Enhance role of CENA and Approved Social Housing Bodies in developing Traveller specific accommodation.

Traveller specific accommodation be provided under the Single Stage Planning Process.

Expansion of the choice-based lettings system website - Travellers are statistically less likely to have WiFi access and more likely to have literacy difficulties meaning that CBL is not universally accessible. This proposal should be equality proofed, given the barriers to navigation of the service for some Travellers

Introduce a social housing passport to allow households move from one local authority list to another - We welcome this Housing for All commitment. Recent Mercy Law research, available here, as well as case studies and anecdotal evidence from across the country, show Travellers are disproportionately affected by the local connection rule, and the passport system may alleviate this.

4. What are the main obstacles to delivery of housing across tenures (e.g. social, affordable, private rental and private homeownership) and household types (e.g. single person households & families)? What short or long-term actions should be taken to increase the scale and speed of delivery and improve approaches to delivery of housing?

3000 character(s) maximum

Lack of accountability for lack of drawdown of Traveller accommodation budget, and the lack of plans for delivery of Traveller specific accommodation

Actions:

Establish the National Traveller Accommodation Authority to provide independent accountability and monitoring of planning and delivery of the TAPs.

Ring fence and protect a national budget for Traveller accommodation and inunct a midterm review of progress and assign projects delayed to the Planning Regulator.

The “Part 8” process where elected representatives vote on Traveller-specific accommodation.

Intrenched discrimination and lobbying of councillors by some factions of the public means this often halts plans for Traveller-specific developments committed to under TAPs.

Action: Amendment to the Planning and Development (Housing) and Residential Tenancies Act 2016 to circumvent the current Part 8 process to An Bord Pleanála, should be applied.

3) The continued overreliance on HAP as a primary mode of delivery of accommodation, failing to recognise the unsuitability of private rental accommodation for many Travellers given both the high levels of discrimination experienced by Travellers in the private rental sector, and the the lack of rental properties suitable for larger family sizes.

Actions: Housing for All should prioritise the delivery of good quality local authority social housing stock, including Traveller specific accommodation.

Travellers who currently avail of HAP/RAS should be able to continue to be eligible to apply and be considered for Traveller-specific accommodation.

4) Sites for Traveller specific accommodation not identified under City or County Development Plans, or within Traveller Accommodation Programmes.

Actions: sites to be identified in TAPs and aligned with CDPs.

5) Widespread inconsistencies in approach between local authorities in planning, target to deliver to meet current need, mode of delivery for provision, redress for emergency or homeless needs, and adequate growth planning meaning many TAPs do not meet current or future need.

Within the current TAPs, five Local Authorities did not account for any new family formations over the 5 year Programme, meaning that young couples reside in the worst conditions, sharing overcrowded bays or houses or are forced to avail of emergency accommodation on a long term basis, and children are born into hidden homelessness or emergency accommodation.

Action: Local authorities should assess future need for accommodation over the 5 year period of the Traveller Accommodation Programmes and include these in their targets.

6) Lack of constructive action to combat homelessness, including hidden homelessness, of Travellers.

Action: Redress the high level of discrimination encountered by Travellers in accessing homeless options, and work with the community in the provision of culturally appropriate options

5. What actions should be taken, in order of priority, to ensure that housing is available for all sectors of society, including our ageing population and people with disabilities?

3000 character(s) maximum

Travellers should be named as a group disproportionately affected by the housing crisis, alongside ageing population and people with disabilities; and to whom the government, under the Housing (Traveller Accommodation) Act 1998 has a statutory responsibility in planning for and delivering Traveller specific accommodation. The specific needs of Travellers with intersectional disadvantages, for example Travellers with a disability and aging Travellers should also be recognised within the strategy.

The current Housing for All outcomes says “Ensure that an appropriate mix of housing design types is provided...” this should be expanded to include:

the provision of quality Traveller specific accommodation, and increased targets for same. Last year, while there was an increase in budget drawdown due to Covid emergency measures, just 7 group housing units were constructed, and it is unclear if these were new builds or refurbishments. No halting site bays were constructed.

Traveller-specific accommodation included in Social Housing Construction Projects Status Reports

Targets identified for Traveller-specific and standard housing including single instance housing that caters for larger Traveller families, given that more than 1 in 4 Irish Traveller households had 6 or more persons compared with less than 1 in 20 households overall. Only 4% of new social housing units in Dublin City Council and Cork City Council areas comprised four or more bedrooms.

A network of transient sites established to cater for the needs of nomadic families

National Traveller Accommodation Authority established to oversee planning and delivery of Traveller Accommodation Programmes.

A nationwide survey of Travellers should be undertaken, to quantify needs and the levels of hidden homelessness that currently exist - those living in chronic overcrowded accommodation or on unauthorised sites and redress same.

Restore the Traveller Accommodation Budget to pre-recession levels.

Ensure sufficient resourcing of Expert Review programme board projects to fully implement its recommendations.

Reduce structural barriers for Travellers across entry points such as in social housing equity, family size, barriers in Housing Assessment applications, in discriminatory practices in accessing private rental accommodation, accessing mobility adapted Traveller specific provision and in accessing medically required appliances where there is no stable electricity supply on sites

Ring fence retrofitting quotas in the National Retrofit Scheme for Traveller Accommodation

Introduce rent to buy scheme for Travellers wishing to buy their own home and address barriers to Travellers obtaining planning permission to build their own homes.

6. Do you have any further comments on the development of the Housing for All policy and action plan that you would like to add?

1500 character(s) maximum

Consultation and evaluation processes in partnership with all stakeholders at a local and national level should be a key part of the development and implementation of the policy and action plan.

It should be aligned with the plan of the Programme Board for the implementation of the recommendations of the Traveller Accommodation Expert Review.

It should reference Ireland's relevant commitments under international human rights bodies, and findings against Ireland in relation to provision of accommodation, and corresponding plans to remedy these breaches.

One of the Programme for Government's commitments is "Review the National Traveller and Roma Inclusion Strategy 2017-2021 and ensure that the successor strategy has a stronger outcomes focused approach." This should include strong outcomes and targets for Traveller accommodation.

The strategy should include a post-Covid 19 recovery plan, ensuring those most affected by Covid 19, and who have been identified under the joint HSE-DHLGH Traveller Accommodation Covid 19 Preparedness Checklist, receive adequate supports, ensuring the same stark vulnerabilities to Covid 19 and other infectious diseases that were highlighted throughout the crisis are not allowed to perpetuate into the future. It should ensure that any temporary measures provided under the Covid 19 response such as sanitation facilities are upgraded to permanent facilities, with clear guidelines given to local authorities.

7. Do you have any supporting data or other material that you would like to upload?

No

Please upload your file

What we will do with your responses

Thank you for taking the time to consider and respond to this consultation.

Please note any submission made may be published.

Download

[Final Privacy Statement on Stakeholder Consultation on Housing for All Policy Statement and Action I pdf](#)

Contact

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