

Independent Research Report

# **Good practice in the development and design of Traveller-specific accommodation 2024**



**An Ghníomhaireacht  
Tithíochta**  
The Housing Agency

## **Disclaimer**

This work was commissioned by the Housing Agency on behalf of the Department of Housing, Local Government and Heritage. The Housing Agency's purpose is to provide expertise and solutions to help deliver sustainable communities throughout Ireland. The views expressed in this report are those of the author(s) and do not necessarily represent those of the Department of Housing, Local Government and Heritage or the Housing Agency.

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## Foreword

I welcome this independent research report on good practice in the development and design of Traveller specific accommodation.

Traveller culture, like all cultures, is not static, but is evolving and responding to its environment. This research focuses on an important enabler of Traveller culture – good practice in the appropriateness of location, scale and design of Traveller-specific accommodation.

The focus of this work is on group housing and halting sites. Key learnings from the research include the value of inclusive and meaningful engagement, the importance of site layout designs that are safe and secure to resident wellbeing, and the importance of fire safety in site planning and layout. The research also provides insights on the characteristics of successful sites, those that respond to features of Traveller life, and proposes a range of supporting design principles.

I would like to thank Micheál de Siún, lead researcher on this project, and Seán O’Riordáin and Jack Keyes for their expert inputs. Also, my colleagues Ann Marie O’Brien and Shane Burke who managed the project and colleagues in the Department of Housing, Local Government and Heritage for their support. Most of all, I would like to thank all those who gave of their time to help with the research, who facilitated site visits in Ireland and Northern Ireland or were interviewed.

**David Silke**  
**Director of Insights and Operations**

# Acknowledgements

This report would not have been possible without the support and contributions of many individuals and organisations.

We extend our heartfelt thanks to the members of the Traveller community, whose invaluable insights and lived experiences have been central to the development of this report. Their willingness to share their stories has provided us with a deeper understanding of the challenges and opportunities related to Traveller accommodation in Ireland.

We are also grateful for the cooperation of local authorities, housing officers, and approved housing bodies who contributed data and feedback throughout the research process. In particular, we would like to thank the Local Government Management Agency (LGMA), the County and City Management Association (CCMA), and the Northern Ireland Housing Executive, whose input has been essential in shaping the findings and recommendations of this report.

A special word of thanks goes to the National Traveller Accommodation Consultative Committee (NTACC) for their ongoing commitment to improving accommodation standards for the Traveller community. Their expertise and advice have been invaluable in guiding the direction of this work.

We also wish to acknowledge the great assistance received from many of the organisations advocating for Traveller rights and equality, including the Irish Traveller Movement, the National Traveller Woman's Forum, Pavee Point, Offaly Traveller Movement, Birr Travellers and Settled People's Group, Clondalkin Travellers Development Group, and the Tallaght Travellers Community Development Project.

The team received extremely helpful input from several sections within the Department of Housing, Local Government and Heritage (DHLGH) who generously gave of their time and expertise, including the Traveller Accommodation Unit, the National and Regional and Urban Planning section (NRUP), and the National Directorate for Fire and Emergency Management (NDFEM). Their contributions were crucial to the success of this project. We would also like to thank the Advisory Group which met with us and the Expert Report Implementation Group which is eagerly awaiting publication of these guidelines.

Finally, we would like to express our sincere appreciation to the Housing Agency and the Department of Housing, Local Government and Heritage, whose financial support and commitment to advancing social equity made this research possible. Without their funding and backing, this report would not have been completed.

# Executive Summary

## Background to Report

This report was commissioned by The Housing Agency to research and prepare draft guidelines on good practice on the appropriateness of location (planning), scale and design of Traveller-specific accommodation, for the Minister at the Department of Housing, Local Government and Heritage (DHLGH). The research was undertaken by a consortium led by desiun Architects with the support of the Public Policy Advisors Network.

## Structure of Report

The report is presented in two parts. Part 1 is a report based on the research on good practice in Traveller-specific accommodation and the second part contains proposals for guidelines for use by Local Authorities when designing and delivering Traveller-specific accommodation, including the detailed research undertaken which is primarily presented in supporting appendices. This includes the desktop reviews, face to face interviews and field work associated with preparation of the actual draft design guidelines themselves.

### **The parts are structured as follows:**

#### **Part 1: Report**

Chapter 1: Background and Research Methodology

Chapter 2: Policy Context

Chapter 3: Stakeholder and Public Engagement  
for the Research Project

Chapter 4: Research Recommendations

#### **Part 2: Proposed draft guidelines and good practice for the delivery of Traveller Accommodation**

Chapter 5: Overview

Chapter 6: Design Guidance

Chapter 7: Proposed Guidance on Location of  
Traveller Specific Accommodation

Chapter 8: Guidance on Consultation for  
Developing Traveller Accommodation



## Key Finding:

On review of the very many housing types and typologies developed and deployed by local authorities and housing providers in response to Traveller specific accommodation programmes over the last number of decades, a wide range of outcomes can be observed. There are several developments where stable communities are formed and Travellers feel supported in both their accommodation needs and in their cultural identity. However, there are many other developments where vacancy and voids, dereliction, and extremely poor living environments ensued. These unsuccessful schemes take a terrible toll on their residents' health outcomes and on their mental health<sup>1</sup> and contribute to the perpetuation of extremely negative attitudes towards Travellers among the general population. They are also extremely costly to the public purse, far beyond the initial cost of construction.

The design of the unit, however, was not a reliable predictor of whether a development was successful or unsuccessful. Indeed, in several instances, such as in Oliver's Park and Labre Park, near identical housing units were built, but with massively divergent outcomes.

It quickly became apparent that the challenge in designing accommodation for Traveller households does not just revolve around the design of the unit or the site, but in the engagement and enfranchisement of the people and households who will live together on the site.

These proposed draft guidelines, therefore, are predicated on a process of community engagement, and a high degree of involvement from the households for whom the development is intended. They are framed as a series of principles, considerations and themes that will lead a structured discourse and design development, offering an opportunity for cultural cues to be

<sup>1</sup> McKey, S. et al.. (2022) 'A rapid review of Irish Traveller mental health and suicide: a psychosocial and anthropological perspective', *Irish Journal of Psychological Medicine*, 39(2), pp. 223–233. doi:10.1017/ijpm.2020.108.



reflected in the scheme. Although this community engagement approach contrasts with the general provision for social housing, it does align with the National Planning Framework (NPF) objectives<sup>2</sup> and is considered necessary to build trust and ownership among the residents, one of the most significant contributing factors observed in successful Traveller specific developments.

### **Key themes that emerge from the research:**

1. One size does not fit all. Successful schemes, where stable communities are formed and Travellers feel supported in both their accommodation needs and in their cultural identity, can often share many physical design traits with unsuccessful schemes. The greatest predictor of a successful scheme is a high degree of meaningful engagement with both the design and management of the development, including allocations.
2. The diverse nature of Traveller households means that Traveller Culture is not a single fixed concept, and Culturally Appropriate designs can only emerge from meaningful engagement with Travellers themselves.
3. Integration not assimilation. Many Travellers consulted in this research expressed a desire to be integrated into their communities while also maintaining and celebrating their cultural identity. Most Travellers interviewed did not want their accommodation to be physically or visually isolated from the surrounding neighbourhood.
4. A strong association with outdoor living and connection to outdoor social spaces is often expressed. A lot of Travellers' cultural life happens out of doors, while a desire for internal spaces to have good quality daylight and views of the surrounding area is also prevalent.
5. Positive engagement with the local authority on maintenance and allocations was seen as a significant contributor to sustainable tenancies and to general wellbeing on sites for Travellers.
6. Sheds, yards, and a touring caravan were often identified as culturally specific features of a Traveller accommodation scheme, although this was not universal, and the importance of these features could vary between different households.

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<sup>2</sup> Department of Housing, Local Government and Heritage (2018), Project Ireland 2040: National Planning Framework, Section 6.3, pp 84-85.

## **Key Recommendations:**

### **1. Funding should be provided for early, meaningful, and consistent engagement with Travellers in the planning and development of Traveller specific projects.**

- Structured community engagement, as outlined in Chapter 8, should be supported through the payment of fees for this work. Engagement should be undertaken before design work commences and should continue during design development. A high degree of involvement from Travellers with the design development should be sought, as well as inputs for the management and maintenance of the site, and a strategy for allocations. The engagement should be recorded and should include diagrams, drawings, and other visualisations to facilitate meaningful feedback, discussion, and informed signoffs between Traveller representatives and the Local Authority.

### **2. Architects and designers should be aware of the different cultural cues and norms of the group for whom they are designing.**

- Design teams, whether in-house Local Authority or appointed externally, should liaise with the households, and hear their feedback. Local Authorities in consultation with the Local Traveller Accommodation Consultative Committee (LTACC) should organise training on Traveller culture for Local Authority personnel and design teams involved in these projects. Chapter 6 gives guidelines on themes and considerations that may assist in developing culturally appropriate design proposals. Some aspects of designing for Traveller culture will require an understanding of existing guidance. For example, where the keeping of a touring caravan on curtilage is proposed, it will be necessary to have consulted Guide to Fire Safety in Existing Traveller Accommodation (2019). Where vehicular access to rear yards is proposed this should be considered in the context of available area and land use objectives.

### **3. New sites should be located where amenities are close by and, generally, not in peripheral or isolated locations.**

- Guidance on the location of Traveller Accommodation is given in Chapter 7. There should be adequate amenity and play spaces for the residents of the scheme in

line with the Design Manual for Quality Housing and Sustainable and Residential Development and Compact Settlement Guidelines for Planning Authorities (2024). New and redeveloped sites should seek opportunities to be open and visible to the wider context and surrounding neighbourhoods. In this respect, high walls isolating the public spaces of a group housing scheme or halting site should generally be avoided.

#### **4. The future and sustainability of any proposed development should form part of the discussion with Travellers, including a plan or strategy for expansion and for allocations.**

- Any area set aside for future expansion should be considered in terms of landscape, surface finish, use, passive surveillance, and positive overall contribution to the site. Future adaptability, changes in household formation, and concepts of universal access and ageing in place should also form part of the discussion.

#### **5. Funding applications for culturally specific design features should be permitted as part of the social housing approval process.**

- Applications should identify costs associated with culturally specific design features separately in the Project Review cost proposals, and a narrative of the engagement process that resulted in these features should be included in the technical report submitted to the Department at each stage. The application for this cost allowance must be reasonable and justifiable in the context of the available budget. It is recommended that these applications be assessed on a case-by-case basis relative to the LA Basic Unit Costs.

#### **6. Site layouts should provide safe and secure spaces, facilitate a healthy environment, and the layout should afford good passive surveillance.**

- Traffic on the site should be managed to reduce vehicular speeds while accommodating different types of vehicular movement, for example, towing of long trailers or mobile homes. Design with respect to waste collection and management, and access and egress to sites for vehicles and emergency services should form part of the discussion with residents. Proposals for external lighting are important, especially for halting bays where there will be regular access required between mobile home/

trailers and day units. A site lighting design and assessment, with calculated lux levels, should be prepared for every development, including halting sites.

**7. The importance of outdoor space and outdoor living is regularly identified as fundamental to Traveller life. The design of Traveller Accommodation should have regard to the arrangement of outdoor space and the potential to create outdoor social spaces.**

- Designers should consider the arrangement of external spaces relative to sheds, living spaces and social activities. Strong visual and physical connections to outdoor spaces from the principal living and kitchen spaces should be considered, such as large sliding doors and large windows in line with *Design Manual for Quality Housing*. Living spaces should be bright, well lit, and have a good connection to the principal outdoor space. As far as possible, the living space should have good visual connection to the surrounding area and curtilage. Open plan kitchen and living arrangements may also be considered.

**8. Aspects of Halting sites and Hybrid sites will require particular attention from designers including fire safety, and layout and planning.**

- The National Directorate for Fire and Emergency Planning's *Guide to Fire Safety in Existing Traveller Accommodation* will be extremely important in ensuring the safety of the residents and access for the emergency services. Additionally, an understanding of the nature of the mobile homes/trailers, how these are used and accessed, should form part of designers' considerations. Sanitary, wastewater, electrical and water connections should be provided to each halting bay. Good access and wide gateways to bays should be provided for vehicles, and to allow access to periodically replace mobile homes/trailers. Sanitary fittings and facilities in day units should be of a residential type, and not institutional or commercial in scale and feel.

**9. Where a community support building is proposed, it should be near the front of the site, visible and, ideally, available for uses in the general community as well as Traveller specific programmes.**

- Floor areas for community buildings should be proportionate to their proposed use, and to the community that they will

serve. Non-residential works, such as community facilities, should be identified separately within cost plans submitted for approval to the Department.

## Part 1: Independent Report

### 1 Research Introduction

#### 1.1 Background

desiun Architects, (the Consultant) leading a consortium including members of the Public Policy Advisors Network, were appointed by The Housing Agency to prepare research and draft guidelines on good practice on the appropriateness of location (planning), scale and design of Traveller-specific accommodation, for the Minister of State at the Department of Housing, Local Government and Heritage (DHLGH).

The undertaking of this research follows a recommendation (among others), in 2019, of The Traveller Accommodation Expert Group which recommended:

“Research on good practice in the planning, design, management and maintenance of halting sites should be commissioned which takes account of changes in caravan design and size, and Travellers’ needs and household size. On the basis of this research and also through consultation with Travellers and social landlords, up-to-date guidelines on the planning, design, management and maintenance of Traveller-specific accommodation should be issued.”

On foot of the Accommodation Expert Groups recommendations, a Programme Board was established to review and make progress on the Group’s recommendations. The Programme Board, in 2022, recommended to the Minister of State that such research be carried out. The Consultant was appointed following a public procurement competition in August 2022. A summary of the Terms of Reference are provided in Appendix 6 to this Report.

#### 1.2 Methodology Overview

The Consultant proposed the following research methodology which was accepted by a Project Steering Group set up to supervise the research. The Project Steering Group includes members drawn from the Department of Housing, Local Government and Heritage, Representatives of the Traveller Community, The Housing Agency, and Local Government.

The research methodology includes as follows:

1. Examination and review of best practice in the design of Traveller-specific accommodation.
2. Examination and review of best practice in terms of the location and development of Traveller-specific accommodation.
3. Review/analysis of existing design guidance issued by the Department of Housing to establish good practice principles.
4. Preparation of recommended good practice and guiding principles that could be applied to all local authority areas.
5. Provision of guidance on the best means of carrying out consultation to deliver Traveller-specific accommodation that meets the specific needs and requirements of the intended occupants.

### **1.3 Work Programme**

The team completed the following actions:

- Completion of desktop study to facilitate a compilation of examples of good practice of Traveller accommodation in Ireland and internationally (including UK/Northern Ireland).
- Examination, in detail, of the implication for design guidelines of existing studies such as the national guidelines issued in early 2000s and, thereafter, on halting site and group housing design.
- Examination of existing relevant guidelines for standard housing including those for universal design.
- Consideration of recent publications of the Office for Planning Regulation and the Irish Human Rights and Equality Commission (IHREC) Tool for Evidence Based Assessment.
- Examination of examples of good design known to stakeholders and relevant reviews for the Office of the Ombudsman for Children.

- A consultation framework was agreed with the Project Steering Group and resulted in engagement with a variety of representative organisations, representatives of the Traveller community and relevant statutory bodies including local authorities.
- 12 fieldwork visits were undertaken in rural and urban areas to Traveller specific accommodation in Ireland and Northern Ireland to assess policy and practice and its manifestation on the ground in both jurisdictions. Certain good practices were consistently noted in successful sites, albeit with some variations. Likewise certain other practices were consistently found on sites that were less successful. See Appendix 1 and 2 to this report.

#### 1.4 Guiding Principles

The methodology acknowledges that while public understanding of halting sites and group housing has become somewhat blurred in recent years, they are in effect distinct housing options and should be considered as such. Hybrid models are addressed in the report. In addition, thinking on energy efficiencies and the challenge of climate change have been factored into the report. It is noted that due to historical construction methods the standard of existing accommodation in group housing schemes, including day units in halting sites, is sometimes extremely poor.

Costs of ongoing maintenance have increased dramatically over the past decade, most notably in the past year. Some costs are the result of poor design, the use of inadequate materials in their construction (e.g. flat roofs that leak, concrete floors with no insulation etc.), the lack of substantial upgrading, and, in some cases, dumping in non-overseen portions of said accommodation can also be a factor.

Given the demand for catering for expanding family sizes over time the possibilities of allowing for future expansion including attic or ground floor extension are also considered.

Underpinning all of the above is the imperative of respecting the intent of national policy and regulation which is to provide for culturally appropriate Traveller-specific accommodation whilst also achieving value for money. It is important that this is understood and consequently assessed in a broad context, including the cost of failure of Traveller accommodation.

The consultant also had to consider what hasn't worked. These included the extent to which Travellers were involved in selecting site locations, in the design of the proposed accommodation and in the ongoing management of sites. The large number of families accommodated on some sites has been problematic in many cases. Other key elements to consider include the overall environment, the design standards including the quality of the material used in the construction, the maintenance of the relevant accommodation and the compatibility of families.

### **1.5 Restrictions and Obligations**

Regard has also been given in this report to taking a human rights-based approach as required under the Public Sector Equality and Human Rights Duty of the Irish Public Sector, provided for in Section 42 of the Irish Human Rights and Equality Act 2014. The Human Rights Act, 2014 provides for the Public Sector Duty to eliminate discrimination, promote equality of opportunity and the protection of human rights. The Section applies to local authorities as they carry out their housing functions in a manner that eliminates discrimination, promotes equality of opportunity, and protects the human rights of those they provide services to.

Confidentiality and application of the provisions of the GDPR apply throughout this Report.



## 2 Policy Context and Review

### 2.1 Profile of Irish Travellers

According to the 2022 Census, 32,949 Travellers were recorded, representing 0.66 percent of the general population, an increase of 5.1 per cent since 2011. As stated in the *Report of the Task Force on the Travelling Community (1995)* ‘Travellers long shared history, cultural values, language, customs, and traditions make them a self-defined group, and one which is recognisable and distinct. Their culture and way of life, of which nomadism is an important factor, distinguishes them from the sedentary (settled) population.’<sup>3</sup> In March 2017, the Irish Government officially recognised the ethnic status of the Traveller community anticipating that this recognition should help Traveller families have a ‘better future with less negativity, exclusion and marginalisation.’<sup>4</sup> However, it is widely documented that Travellers continue to experience extreme disadvantages in terms of employment, housing and health and face exceptionally strong levels of prejudice.<sup>5</sup>

In terms of the age profile of Travellers, the Census found that ‘children under the age of 15 made up 36% of Irish Travellers compared with 20% of the total population. At a national level, 15% of the total population was aged 65 years and over while for Irish Travellers, the equivalent figure was just 5%.’<sup>6</sup> The young age of the Traveller population suggests that the demand for Traveller accommodation will continue to increase in the future.

### 2.2 Trends in Traveller Accommodation

The annual estimated figures are submitted by local authorities to the Department of Housing, Local Government and Heritage annually, and are the other main data source in relation to Traveller accommodation. The estimate includes the number of Traveller families accommodated by the local authorities in Traveller-specific accommodation and standard housing, the number of Traveller families living on the roadside, and the number of Travellers who privately source accommodation.

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<sup>3</sup> Government Publications (1995), *Report of the Task Force on the Travelling Community*.

<sup>4</sup> An Taoiseach Enda Kenny TD (2017), Statement on the recognition of Travellers as an ethnic group, Dáil Éireann.

<sup>5</sup> Economic and Social Research Institute (2017), *A Social Portrait of Travellers in Ireland*, Research Paper Number 56.

<sup>6</sup> Census 2022 Profile 5 - Diversity, Migration, Ethnicity, Irish Travellers & Religion at <https://www.cso.ie/en/releasesandpublications/ep/p-cpp5/census2022profile5-diversitymigrationethnicityirishtravellersreligion/irishtravellers/>.

**Table 2.1: Total Number of Traveller Families in all Categories of Accommodation**

Type	2017	2018	2019	2020	2021	2022
Accommodated by or with assistance of LA	6,234	6,593	6,738	7,187	7,607	7,988
Unauthorised sites	585	591	529	468	487	654
Own resources	795	744	690	501	876	813
Private rented	2,387	2,165	1,919	2,162	1,882	1,821
Sharing houses	1,882	1,115	927	933	800	907
<b>Total</b>	<b>11,116</b>	<b>11,020</b>	<b>10,809</b>	<b>11,118</b>	<b>11,680</b>	<b>12,183</b>

(Source: Department of the Environment, Climate and Communications Annual Counts 2017-2022)

In the 2022 Annual Estimate, 12,183 Traveller families were recorded. 7,988 of these families were accommodated with or through the assistance of local authorities. The majority of families were accommodated in standard local authority housing. At the end of 2022, 654 Traveller families were living on unauthorised sites and 907 families were sharing accommodation. In addition, 1,881 families were in private rented accommodation.

**Table 2.2 Total number of Traveller families in accommodation provided by or assisted by local authorities**

<b>Accommodation Type</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Standard Housing	3,701	3,941	4,034	4,292	4,594	4,830
Group Housing	798	832	852	862	866	929
Private houses	436	419	473	459	448	502
Voluntary Bodies	317	356	427	527	645	738
Halting sites	982	1045	952	1,047	1,054	989
<b>Total</b>	<b>6,234</b>	<b>6,593</b>	<b>6,738</b>	<b>7,187</b>	<b>7,607</b>	<b>7,988</b>

(Source: Department of the Environment, Climate and Communications Annual Counts 2017-2021)<sup>7</sup>

<sup>7</sup> Those in receipt of HAP are not included in this table.

Over the six-year period between 2017 to 2022, an additional 1,754 Traveller families were accommodated by, or with the assistance of, the local authorities. The majority of families, 1,129 (64%), were accommodated in standard housing. 147 families were accommodated in Traveller-specific accommodation (140 in group housing and 7 in halting sites). The remaining 487 families were accommodated in either private rented housing (66) or in voluntary housing (421).

Research carried out by the Irish Human Rights and Equality Commission and the Economic Social Research Institute in 2018 found that, while Irish Travellers make up less than 1% (0.66%) of the population, they account for nearly 9% of homeless people.<sup>8</sup> There is a lack of data in respect of the Traveller community's experience of homelessness.<sup>9</sup>

These main sources of data reveal a growing Traveller population which is now heavily reliant on the provision of standard accommodation, whilst also becoming increasingly vulnerable to homelessness.

In summary, key trends in Traveller accommodation are as follows:

- The number of Travellers living in standard local authority housing is increasing steadily.
- There are still a considerable number of Traveller families living on the roadside, in overcrowded conditions, in private rented accommodation or who are homeless.
- There is a high percentage of the Traveller population under 18 years which indicates that Traveller accommodation needs are unlikely to decrease into the future.

### **2.3 Current National Policy Framework**

The National Traveller Accommodation Strategy provided for the introduction of the Housing (Traveller Accommodation) Act 1998. The Act enshrines in law the requirement on local authorities to provide accommodation to the Traveller community including; halting sites, group housing schemes, standard houses, and transient accommodation.

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<sup>8</sup> Grotti, Russell, Fahey & Maitre (2018) 'Discrimination and Inequality in Housing in Ireland' <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland.pdf>.

<sup>9</sup> Focus Ireland (2021) Submission to Joint Committee on Key Issues affecting the Traveller Community Access to Housing and Accommodation.

Traveller ethnicity is one of the key elements that should inform the design and delivery of Traveller accommodation. ‘Policies and programmes that respond to the needs will only be effective to the extent that they take into account the culture and identity of the group concerned.’ While there was a distinct move to include Traveller culture and identity in policymaking and a strategy to ensure Traveller cultural needs were reflected in their accommodation, evidence suggests that this has not translated into practice at a local level.<sup>10</sup>

The majority of accommodation provision for Travellers has been through the public standard housing stock. The National Traveller Accommodation Consultative Committee (NTACC) noted that the housing outputs for Traveller families over the past 50 years have broadly been at variance with professed Government policy. It has suggested that ‘radical new ways of delivering, managing and financing appropriate accommodation supports for Traveller households that respect choice and culture are required.’<sup>11</sup>

Several other developments relevant to the provision of Traveller accommodation have evolved. The most significant was the *National Traveller and Roma Inclusion Strategy 2017-2021* (2017). In terms of accommodation, the Strategy states that ‘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.’<sup>12</sup>

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<sup>10</sup> In 2008, The Centre for Housing Research undertook in-depth research on Traveller accommodation cumulating in three distinct but interrelated reports: *A Review of Policy and Practice* (Coates et al, 2008), *Traveller Accommodation in Ireland: Review of Policy and Practice* (Treadwell Shine et al, 2008), and *Good Practice Guidelines* (Kane et al, 2008). The research found that there are ‘contested views in regard to the ethnic status of the Traveller community, where, for example, accommodation preferences are perceived as related more to lifestyle choice than cultural difference, and have a direct bearing on local policy implementation.

<sup>11</sup> KW Research & Associates (with data analysis by Simon Williams) (2014) *Why Travellers leave Traveller-specific Accommodation?*

<sup>12</sup> Department of Children, Equality, Disability, Integration and Youth (2017) *National Traveller and Roma Inclusion Strategy 2017-2021* can be downloaded here: <https://www.gov.ie/en/publication/c83a7d-national-traveller-and-roma-inclusion-strategy-2017-2021/>

*Housing for All* (published in September 2021) provides a new housing plan for Ireland to 2030 with the overall objective that every citizen in the State should have access to good quality homes through a steady supply of housing in the right locations, with economic, social and environmental sustainability built into the system. *Housing for All* commits to increasing and improving accommodation for the Traveller community with the priority of improving the quality and quantity of Traveller-specific accommodation.

#### **2.4 The Traveller Accommodation Expert Group**

In 2018, the Traveller Accommodation Expert Group was established by the then Minister of State at the Department of Housing, Planning and Local Government, to review the effectiveness of the Housing (Traveller Accommodation) Act, 1998 and whether it provides a robust legislative basis for meeting the current and future accommodation needs of the Traveller community. It also sought to review other legislation that impacts on the delivery of Traveller-specific accommodation.

The Expert Group's review concluded that notwithstanding the strengths of the arrangements provided for in the 1998 Act that enabled the provision of Traveller accommodation, 'they have failed to meet the full scale of accommodation need among this community. This is evidenced by the extremely high rate of Traveller homelessness, the increase in numbers of Traveller households sharing accommodation and living in overcrowded conditions, and the uneven record of delivery of Traveller-specific accommodation among local authorities and also approved housing bodies.'<sup>13</sup> The Review further concluded that 'it is time to overhaul the Housing (Traveller Accommodation) Act, 1998 and other relevant legislation and policies which impact on accommodation provision for Travellers.'<sup>14</sup> There is a core need to address underlying barriers that persist in relation to the delivery of culturally appropriate accommodation provision.

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<sup>13</sup> Department of Housing, Local Government and Heritage (2019), *Traveller Accommodation Expert Review Report*, page i. The report can be downloaded here: <https://www.housingagency.ie/publications/traveller-accommodation-expert-review-2019>

<sup>14</sup> IBID, page i.

## 2.5 A Human Rights-based Approach to Design and Sustainability

Irish law places obligations on local authorities to promote effective participation and uphold the human rights of those to whom they provide services. The Local Government Act 2001, s. 127 (as amended by the Local Government Reform Act 2014) provides for consultation and effective participation of communities in decision making. The Irish Human Rights and Equality Commission Act, 2014 provides for the Public Sector Duty. This requires local authorities to carry out their housing functions in a manner that eliminates discrimination, promotes equality of opportunity, and protects the human rights of those they provide services to. These obligations are further enshrined in governmental policy objectives.

A human-rights based approach offers a framework through which local authorities can meet their legal obligations and duties. Such an approach is defined by the European Commission as a methodology that applies five working principles; Meaningful and inclusive participation and access to decision-making; non-discrimination and equality; accountability and rule of law for all; and transparency and access to information supported by disaggregated data. Recent research in an Irish context calls for the development of a ‘human rights-based national model of tenant participation in Ireland that extends beyond mere consultation and engagement, and seeks to empower local authority tenants to shape the decisions that affect their lives, homes, and communities.’<sup>15</sup>

## 2.6 Local Policy Applications

In Ireland a number of the local authorities have sought to prepare their own guiding principles, albeit that these are framed within the national context and guidance. In examples considered for this review, some authorities have more bespoke sets of principles reflecting local circumstance, but this is not generally the case. There are also differing approaches to policy through the Traveller Accommodation Plans and Development Plans. Some make specific reference to the identification of sites while others have generalised objectives set out. The approach to implementation is therefore varied.

Overriding concerns with addressing legacy decisions has been highlighted in the consultations undertaken with local authorities, while the broader pressures to deliver social housing generally has reduced the priority given to delivery of commitments, where they are set out, in a number of Traveller Accommodation Plans.

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<sup>15</sup> Centre for Housing Law, Rights and Policy (2022), *Empowering Tenants: Protecting Human Rights Effective Tenant Participation in the Management of Local Authority Housing*, National University of Ireland, Galway.

## 3 Stakeholder Engagement

### 3.1 Design of Traveller Specific Accommodation- Local Authority Perspectives

This Review involved in-depth discussions with staff from seven local authorities ranging from urban, peri-urban to rural. Information was also received from additional local authorities. Previous research which had captured local authority perspectives was also considered. Additional information was made available from the County and City Management Association Housing Committee and the Association of Irish Local Government representation on the National Traveller Accommodation Committee. Recent work with Approved Housing Body (AHB), CENA, which involved interaction with ten local authorities in 2018, also gave insights into current challenges and attitudes.

The consultations were carried out using a semi-structured format. This allowed multiple viewpoints about each important issue to be captured. These results represent the viewpoints and opinions of interviewees only and all the perspectives below were points that were articulated during these consultations.

#### 3.1.1 Local Authority Perspective

*“We are run off our feet”* (Local Authority view)

Housing supply has become an increasingly important government strategic priority. Local authorities play a pivotal role in meeting some of this need. They fulfil a traditional role of social housing supply including project management and in-house design and supervision. This entails intense effort at the scheme planning stage including using the four-stage approval process and other mechanisms. However, their remit has widened considerably over the past decade and local authorities now manage many schemes aimed at increasing supply. They also liaise closely with approved housing bodies in their locality and play an enabling role with the private sector through the planning system and other avenues. They deal daily with multiple social housing applicants requiring assistance and anxious to gain access to accommodation.



### 3.1.2 Need

There was universal agreement that the accommodation needs of Travellers has increased over the past ten years. The number of homeless Travellers and mainly younger Travellers living in overcrowded situations in existing accommodation has escalated. Anecdotal evidence also showed a significant decrease in the past 3 years in Travellers living in rented accommodation with a concurrent rise in Travellers accommodated by local authorities in social housing.<sup>16</sup>

All except one contributor recognised that Traveller specific accommodation is the optimum solution to meet the needs of some Travellers. They pointed to the need for choice between standard and Traveller specific housing that could be offered to Travellers when applying for accommodation. There was an acknowledgement that recent general housing shortages have affected Traveller accommodation allocations of social housing but some interviewed pointed to a variety of allocation mechanisms used to ensure that Travellers were considered in a preferential way in some instances.

One contributor stated that halting sites and group housing were wasteful and not working. Excessive levels of conflict, domination by one or a few families, non- payment of rent and the proliferation of voids and abandoned sites suggested that standard housing was the only solution. One local authority contacted but not surveyed stated that it did not provide any Traveller specific accommodation as a matter of course and that standard housing solutions were sufficient.

The majority interviewed expressed that very few younger Travellers opted for halting site accommodation. Where there was well designed group housing accommodation available this seemed to be the preferred option of many requesting Traveller specific accommodation.

### 3.1.3 Consultation

*“Consultation is a special skill and is resource intensive”.*

Almost all local authorities recognised the value in consulting with families on the location of their accommodation. They agreed that some level of consultation was desirable but had different

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<sup>16</sup> Refer to Table 2.1

views about how consultation should be carried out. While most local authorities pointed to at least one good example of a positive consultation process with Traveller families about their accommodation that led to more optimum outcomes, it was felt to be almost impossible to provide the resources to do this on every occasion. It was also acknowledged that many technical and administrative staff had never received training to deliver consultation processes. The huge turnover of staff also meant valuable experience was lost to the Traveller sections within local authorities. It was identified that funding was not available to conduct consultation processes properly. Architects and other professionals engaging with Travellers also need additional training which is not always readily available.

Two authorities identified the employment of an independent facilitator at the consultation stage as good practice. The facilitator worked with staff and the Traveller families who had been chosen for the allocation of the accommodation. Also, it was recognised that consultation that began at an early stage in the design approval process proved to be very successful. They recommended that the provision of a simple step by step guide to good consultation principles would be desirable.

There was a minority view of those interviewed that Travellers should not receive what was described as ‘special treatment’ (i.e. should be treated exactly as other local authority social housing applicants in relation to consultation. It was pointed out that social housing tenants are often allocated accommodation at a relatively late stage in construction and no reason could be seen as to why Travellers ‘deserved’ better service. Another local authority spoke of agreements made not being honoured and changes being requested by Traveller families at the later stages of the design/ construction process that were not possible. Absolute sign-off is needed at the appropriate stage with the understanding that later proposals for alterations will not be possible.

Some counties had worked on schemes and proposals with CENA. There was recognition that the “CENA model” has been reasonably successful but that CENAs capacity was limited.<sup>17</sup>

### **3.1.4 Planning and Location**

*“We locate Traveller accommodation wherever we can get agreement. It could be added to major housing developments”.*  
(Senior Housing Administrator, Urban Authority)

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<sup>17</sup> See Appendix 5.

Most local authorities spoke about the difficulty in gaining political agreement for new Traveller specific sites, particularly for new halting sites. In some cases, the design had advanced significantly when the Part 8 motion was defeated in the council chamber and local residents often participated in campaigns of opposition. This has been one of the reasons for the conversion of halting sites to group housing schemes or the refurbishment of such sites, as no new site acquisitions were required.

Similar difficulties have been experienced when motions around transfer of land to an Approved Housing Body for Traveller accommodation have been unsuccessful. On some occasions extensions to existing halting sites (including nearby land acquisition/zoning) have proved acceptable to the councillors. In recent years the inclusion of a group housing section in new social housing developments have found favour, and for some authorities it should be considered for all new local authority or AHB developments above a certain size.

Under current conditions, officials often engage in lengthy negotiations with parties opposing the developments. It was felt that the use of emergency powers by the Chief Executive was not a solution, given the importance of councillor/executive relationships across a range of strategic issues. The provision of limited Traveller accommodation in Part V had happened in some cases but needed to be further explored. This could be a possible solution to overcoming some of the challenges outlined.

Most local authorities identified group housing as the future preference of Travellers, and this could include caravan space if the site allowed (see below). Compatibility of families was highlighted as a key element that determines the success of group housing schemes. Due to larger families' sizes in some cases, there is a need for 5-bedroomed accommodation. This can be difficult to satisfy under current rules.

In urban areas 2-storey houses were acceptable to Travellers when density constraints were explained (viz single storey houses limit yard space), or where choice was limited.

The demand for rural cottages has increased recently in some cases. However, it was felt undesirable to locate future Traveller specific multi-unit developments in rural areas. The provision of transient sites was identified as problematic from a planning and management perspective.

It was generally agreed that the general housing zoning was preferable to specific Traveller site zoning. Otherwise, development plans could be unduly delayed and needs often varied over the 5-year planning cycle. However, two local authorities were of the opposite viewpoint stating that it was necessary to name several site locations at the development plan stage to meet predicted emerging need. It was universally agreed that the number of units should ideally be 6 to 8 as larger sites can give rise to challenges. In some cases, large halting sites were redesigned to effectively split them in two or more sections during refurbishment.

The cooperation of DHLGH was acknowledged in the planning area, including around density requirements. In some cases, this allowed for a larger individual site size which met the needs of particular families.

### 3.1.5 Design

*“In the 1980s, many families still lived on the road with a gradual move towards urban areas. A halting site allowed elements of the traditional lifestyle to be retained and was very acceptable. Travellers felt claustrophobic in standard housing and many such settlement initiatives failed. But things have moved on and younger Travellers in particular want modern comforts.” (Local Authority Social Worker)*

It was acknowledged that the existing guidelines were no longer fit for purpose and that a “one size fits all” design will not work. All local authorities interviewed identified successful schemes that needed different solutions. A need was expressed for guidance in understanding what is meant by “culturally appropriate design” and for this to be included in future guidelines.

Approaches to design varied around the country with custom and practice often relied upon. In many cases specialist teams, headed by an architect, are employed to design and manage the project with the local authority providing overall project management. In other cases, there is a body of excellent experience built up including in some smaller local authorities and in such instances in-house provision is preferred.

All Traveller accommodation is built to current high standards including Part M and Insulation standards. On two occasions examples were given where housing officials in the relevant local authority catered for additional special needs. One local authority spoke of the need to check for hereditary disease and cater for future modifications at the design stage.

Some of the learning that has emerged over recent years is that Travellers require a larger halting bay structure (day house). This would include a larger kitchen, toilet/shower and reasonably sized living room space at a minimum. The future design of housing should therefore allow, it was suggested, for future extensions to cater for an ageing member of the family (and consequent closeness to toilet facilities). Traditionally, many halting sites were designed with surrounding high walls. There is now a move to eliminate such walls and to integrate the development into the local environment. "It should look like any other estate" was one comment received. It was highlighted that high walls can also hide the importation of waste by outside parties. The provision of space for a caravan was accepted by many as the ideal but in many cases space and density requirements did not allow for this. One local authority suggested the provision of a lock-up storage area at the edge of the site to allow for caravan storage for occasional travel. Concern was expressed at the potential for permanent habitation in caravans on accommodation leading to fire and health and safety issues. This needs to be considered at the design stage, including by the DHLGH. The cooperation of DHLGH officials around cost limits was acknowledged in many cases.

Regarding group housing design, existing standard house designs are used by some local authorities with some modifications. However, it was also acknowledged that initial good design can eliminate many "blind spots", where dumping or anti-social behaviour can take place.

Those interviewed identified that the provision of a play area is desirable on all sites and highlighted that this should be funded by the central authorities. It is more economical to install this facility during the construction phase rather than later. Open spaces should also be included in designs with accompanying defensive landscaping, if required, to create an improved open environment.

One local authority spoke of the desirability of providing extra space that can be managed. This would allow for overflow and temporary accommodation during remediation. However, other authorities felt this would be an additional burden to manage and it was potentially open to abuse.

Interviewees expressed that it is desirable to provide a small shed as part of the standard allocation. They further emphasised that the cost limits should allow for this. Space for a larger shed should be provided where possible as this was a possible route into mainstream employment. This would contribute to the development of “sustainable communities for Travellers.” The provision of space for horses was not seen as feasible in most cases. Renting of nearby council-owned land to families was used as a solution in two cases.

It was identified by some stakeholders that the use of mobile homes is not currently encouraged by the grant/loan system, and that this should be re-examined. This applies in particular to modular construction with a long design life.

It was accepted by most local authorities interviewed that planning for future family growth was ideal, however, almost impossible in practice.

The four-stage design system was seen as problematic by only two of the authorities, as in some cases there were unnecessary delays. Its replacement by a single-stage process, as currently mooted, was deemed by some to be too risky from a local authority finance perspective. Oversight of expenditure on small extensions was excessive in some cases and needed to be relaxed. The provision of additional scope and trust in local authorities to maximise value for money was desirable across all programs.

### **3.1.6 Management and Maintenance**

*“Good liaison with the tenants minimises maintenance.” (local authority area engineer)*

There are widely varying experiences regarding the management of halting sites. In some cases, often when the family mix was working (or one family site), very few management or excessive maintenance issues arose. In some urban areas, but also on rural sites, excessive dumping of rubbish by outside interests caused issues. The benefits of employing an outside management company to manage the site was highlighted as successful in one case. Overall, it was stated by all those interviewed that many halting sites needed excessive levels of maintenance and the funding received from central government is insufficient to meet these costs. However, some local authorities stated that there are

examples of good practice halting sites that should be promoted and shared.

The issue of “internal tensions on site” was identified as the major reason Travellers left Traveller specific sites. Where conflict arose on a site it was often solved by the early intervention of local authority staff. Several local authorities felt they had established good relationships with local Traveller families and support groups and could assist in such circumstances. In some cases, further dialogue with national support groups was seen as necessary to help create better shared understanding. In some difficult cases, the employment of an independent facilitator (or court appointed facilitator) has been successful. The National Traveller Mediation Service is also a useful resource that could be used.

The local authorities also suggested that in-house staff should be used when available. In house staff have continuity of experience, local awareness, political contact and have learned valuable lessons. There is often a lack of understanding around Traveller needs and culture when consultants, such as architects, are hired.

Tenant sustainability post-allocation was seen as important by most, but resources were stretched, and it was difficult to do this properly without additional central government funding.

### **3.2 Design of Traveller Specific Accommodation - Traveller and Traveller Representatives Perspectives**

Eleven visits were undertaken to engage directly with Traveller Communities on halting sites, in group housing, and on transient sites provided by local authorities within the last thirty years. Well designed and poorly designed accommodation in both rural and urban areas was selected to learn from good and poor practices. The purpose of the visits was to elicit Travellers’ views about their accommodation, what constitutes good design and poor design features and how they would like to be involved in the design and management of their accommodation in the future. One-to-one and group interviews were also held with Traveller organisations in the areas where the accommodation was visited.

Extensive engagement with members of the Traveller community and key officials at local and national level was undertaken as this report was prepared. The following sets out the perspective of Travellers about the design, delivery and maintenance of their accommodation. As with all consultations with stakeholders the results represent the viewpoints and opinions of those interviewed and their organisations.

### 3.2.1 Need

*“Why have local authorities stopped building new sites?”  
(Traveller view)*

The basic issue for many Travellers interviewed is a lack of suitable and culturally appropriate accommodation. In some accommodation visited, younger couples with children were living with their extended families in overcrowded conditions due to the lack of availability of new accommodation.

Many of the existing halting sites visited need to be refurbished as they are either designed to outdated or poor standards or, in some cases, the materials used have made existing accommodation uninhabitable. For example, chronic dampness within the houses and day units and poor drainage were evident.

New accommodation provision, including Traveller-specific, is urgently needed to catch up on non-delivery as well as the use of unsuitable legacy sites.

### 3.2.2 Consultation

A number of halting sites and group housing developments visited were built to a high standard in terms of the quality of the accommodation, cultural appropriateness and the quality of the overall living environment. Key elements of their success could be attributed to the engagement of Travellers in the design and management of the accommodation. The results of a robust process of consultation and engagement meant that attention was paid to ensuring culturally appropriate features were built into the environment such as the horseshoe shape of the accommodation, provision of sufficient space to the side and the back of each individual unit for a shed or workspace or to park a work vehicle or touring caravan. In one case, there was provision for horses adjacent to the accommodation and close to a local horse project.

Some good examples include a mixed development of eleven group houses and fourteen halting site bays built 30 years ago. The local authority worked in that case closely with the families on the design of the accommodation which consequently yielded excellent results.

In two cases, refurbishments were being planned closely by key senior local authority officials and the architect with the full involvement of Travellers in the design process.



This involved:

- conducting an individual assessment of each family's needs
- meeting the families collectively to discuss the overall design. This included discussing the parameters for what was possible within the level of resources available
- producing design options based on the individual and collective needs of the families
- presenting the design options to collective meetings with the families and agreeing the overall site design

Travellers found this process rewarding and a good relationship and trust formed between the families and the local authority. The support from the local Traveller organisations was invaluable to this process. The Traveller group undertook the following work:

- met with the families to identify their needs
- worked collectively with the families and ensured good information flow between the council and the families
- assisted the families to prepare for meetings with the council
- supported representatives to provide feedback to the wider family grouping
- provided opportunities to view other models of Traveller accommodation to generate ideas
- provided information on the local authority planning process and timescale

In contrast, in one area, the local authority delivered high-quality two-story housing within a small group housing scheme of five houses, but the maintenance needs of families were not being progressed. For example, the water pressure in the development was not functioning and the fencing around the houses required repairs. The local authority refused permission to the families to keep a touring caravan in the yards. One of the residents stated, "I see settled folk with camper vans parked in their yards in council estates and I can't keep a caravan."

There has been no advancement in developing the surrounding environment such as landscaping and the erection of a grotto, no support to explore how the families could keep horses and there is poor response to maintenance issues. The families identified that the underlying problem is the council did not understand the importance of Traveller culture within the design concept.

In other areas where accommodation was in need of refurbishment, the key and shared elements contributing to the poor examples of accommodation were no input from the community on the design, isolated locations, small site area and yards, substandard materials, poor storage, poor aesthetics such as high walls surrounding the perimeter of some sites and bays described as 'depressing' by residents, lack of greenery, lack of upgrading leading to chronic dampness and poor response to repairs. As put by one of the residents, "the high wall around us brings a depression on me."

In some of the halting sites the families had utilised their own resources to make improvements in their living conditions. For example, a family had upgraded their own day unit by taking out the steel doors, steel sinks and the toilet originally provided and installing a kitchen, comfortable seating area and bathroom. In other halting sites residents had laid decking in their outside area, added chalets to enhance their living space and sheds for storage or for work purposes. In one of the sites, the majority of families had installed Western-style chalets to provide for their own needs as the day units provided in the bays were substandard.

Travellers highlighted that their individual and cultural needs should be provided to contribute to their positive mental health and well-being and for the sustainability of the accommodation. A Traveller man who had erected a work shed on his halting site said, "If I couldn't work in my shed, I'd be in a bad state."

### 3.2.3 Planning and Location

All Travellers interviewed agreed that sites need to be near facilities. Travellers identified that they were often put into isolated locations in the past, sometimes in poor environmental areas close to 'dumps' with poor access to transport, schools, doctors and shops. Traveller accommodation, in the commonly expressed view, could be developed as a subsection of proposed larger housing schemes which could then facilitate both integration and maintenance of identity. Family group housing schemes could be provided in cul de sacs in larger estates to achieve this they suggest. Early and constant consultation which is bespoke to the relevant target community or family is the key to needs assessment and location identification. This could be facilitated if the naming of specific sites in a development plan could be put in place as this was seen as the best way to avoid opposition when sites are scheduled for development. It was noted that political and community opposition may arise if accommodation provision is overly concentrated in specific locations.

It was acknowledged that there is difficulty in finding sites in large urban areas. However, there is concern that the footprint for Traveller accommodation is being significantly reduced even in cases where a halting site is already in existence and there are plans for its redevelopment. While Travellers recognise the challenges to build social housing in urban areas, the best possible design of culturally appropriate accommodation requires that reasonable space is ring fenced for their needs. In rural areas, it was identified that land adjacent to existing sites could be used in some cases to provide for younger families.

In some cases, Travellers identified that they were forced into opting for standard housing as "it was the only game in town." It was noted that it was a misconception that Travellers who reside in houses are no longer Travellers. As put by one Traveller woman, "I live in a settled house, I'm still very much a Traveller." They wish to identify as a Traveller and maintain their culture in standard housing.

The length of time it takes to deliver Traveller accommodation was raised as a significant barrier to Travellers' health and wellbeing. Long delays in the 4 stage and Part 8 processes are seen as unhelpful to consultation and ultimately to the actual delivery of projects.

### 3.2.4 Design

One of the key barriers to achieving good culturally appropriate design identified by many stakeholders during this research was a reluctance by some councils to engage seriously with Travellers about their needs in the design process. This was described by a Traveller man as “taking something important away from some Travellers.”

Some of the Travellers described attending meetings with their council but they never had a meeting with an architect. Consequently they were left feeling as if their views didn't matter. One interviewee expressed that in some cases the council officials held discriminatory attitudes reflecting a personal view that Travellers are trying to get something extra that they are not entitled to. As one Traveller woman expressed, “The council thinks I want a mansion, but I don't. I just need a bit of space in the yard for himself. He'd go mad if he could not do his work out the back.”

It was highlighted that culturally appropriate accommodation is not about looking for something extra, just something different. The cultural aspects to design articulated by Travellers, those interviewed suggested, could in practice cost very little if embedded into the design at the earliest stage possible. For many Travellers, the design is about being able to maintain at least part of their traditional nomadic life e.g., space for caravans on all bays/group houses. For example, in one case, the families were fully involved in the design process and the housing was built to a high standard. The cultural aspects of the site were built into the design such as caravan space to the rear and side entrances, concrete yards, and space for future workspace. An interesting feature is the provision of religious emblems and floral features as designed by the family and provided by the local authority in the outside communal area.

Common culturally appropriate design features cited by Travellers were:

- smaller units of accommodation for family groups
- horseshoe or circular-shaped accommodation and no high walls
- concrete yards large enough to have a work shed or touring caravan

- space to the side of the house, or bay to enable a van to drive in
- adequate space and comfort in housing or bays
- single-storey for older Travellers and older Travellers living in halting sites need to access an integrated unit with a room, bathroom and kitchen or in the case of a house, a room downstairs
- sheds be included from the beginning of the design process
- in a few cases, where families keep horses, stables for horses where required, or room for a horse box if land could be made available elsewhere, or support to access land for horses
- The outside space is a cultural requirement of many Travellers. An open space for all could be protected with kerbs (not boulders) and facilities such as a central meeting space, play area, planting area, a grotto or other cultural aspects are crucial. Safety on site for children and traffic interaction need to be considered.

The type of facilities required will depend on the family's needs and perspectives. It was highlighted that each Traveller family places a different emphasis on traditions and this needs to be explored with each family as part of the agreement of design. As one Traveller woman stated, "I don't speak for every Traveller. We all have different ways. I know my own family and I can speak to that." There is a need to assess, in a structured manner, which facilities are important to the particular community or family. Each case, they suggested, is unique, and the need must be carefully quantified through early engagement. Travellers will understand that there are limitations as to what can be provided if this, and the time scales, are set out by the local authority in an inclusive process of engagement. In cases where accommodation is due to be refurbished a real opportunity exists to deliver culturally appropriate and high-quality accommodation.

It was also highlighted that design needs have a clear regard to the life cycle, and this would involve providing design support to families wishing to improve their units over the family life span. Allowing for future expansion (10% to 20%), where space

permits, as families move through their respective life cycles is important and likely in the longer term to be more cost-effective.

Another element of design that was raised on halting sites was the issue of the provision of caravans for long term living. Caravans are not provided on halting sites as part of the rental agreement with the council. Travellers must provide their own caravan.

In some county council areas, Travellers can access a caravan loan scheme. It was stated by a local Traveller organisational representative that in the experience of the Travellers they worked with, the amount of loan granted was not sufficient to secure a caravan for longer-term living. The caravans depreciate over a few years and the loan still must be repaid, although the loan structure is heavily discounted by the State with on average only 25% of the loan being repaid by the borrower. This leads to a situation, they argued, where Travellers are paying caravan loans on substandard caravans. The Traveller organisational representative recommended that the provision of caravans for long-term living should be considered in the design concept for halting sites.

### **3.2.5 Management and Maintenance**

In the accommodation that was in need of refurbishment Travellers spoke about inadequate maintenance on these sites. Poor response times to water pressure issues, chronic dampness, rat infestation and maintenance of communal areas were cited. It was suggested that Travellers should be employed in maintenance roles as they would understand the frustration of having ongoing repair issues and may prioritise Travellers' needs. Travellers were concerned that their needs were being overlooked due to discrimination. One Traveller stated, "some on-site staff are good, but others are prejudiced."

In the better models of accommodation, positive relationships existed between Travellers and council staff and maintenance and management issues on site were dealt with efficiently. For example, one council has employed a caretaker who assists the families with the maintenance of communal areas and liaises with the families on its management, including the allocation

of vacant units that arise from time to time. As expressed by a Traveller woman, “We have a say in how things are run, in how we live.” A Good Relations Officer is employed in one example to liaise with Travellers and respond to any maintenance and management issues in a timely manner.

### 3.3 Traveller Accommodation – Other Perspectives

In-depth discussions were also held with a variety of other stakeholders:

- NTACC chair and four members
- Housing Agency
- CENA
- Two Approved Housing Bodies

Initial contact was made with the Office for the Planning Regulator. The Office has made recent progress in developing and issuing guidance in regard to the preparation and development of Traveller accommodation and the approach to be applied in a local authority county development plan<sup>18</sup>. The Local Government Management Agency stated it had little experience in this area and no in-depth contact was completed. The Department of Housing Local Government and Heritage has been fully supportive during the process and staff passed on invaluable advice.

Much of the feedback received has already been recorded in the previous sections and is not repeated here but in the following comments were made by at least one of the consultees.

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<sup>18</sup> OPR Case Study Paper CSP03 Traveller Accommodation and the Local Authority Development Plan, October 2021

### 3.3.1 Need

There is a compelling need for the accelerated provision of culturally appropriate accommodation for Travellers. Accommodation needs are measured in different ways across the country. As such, there is a need for a standard approach that allows Travellers options including movement from standard housing to culturally appropriate accommodation. Homeless Travellers also need to be counted when compiling need. The Traveller identifier should be linked to this work.

The National Traveller Accommodation Consultative Committee (NTACC) needs to have a supervisory role in midterm reviews to collect accurate data. It, or an equivalent national body, could coordinate the housing needs assessment.

It was stated that some local authorities have built little or no accommodation in recent decades. This needs to be addressed through a strong national body to ensure delivery happens at the local level.

### 3.3.2 Consultation

“An important aspect of the consultation is understanding the dynamics of the families on the site and who you would be living next to.”

Proper consultation is seen as the main determinant for success of Traveller accommodation. The NTACC pointed to its long experience in this area and referred to discussions held on sites during regular site visits. As all parties are represented on the NTACC it is a de facto consultation forum.

Approved Housing Bodies acknowledged their relatively low participation in providing culturally appropriate accommodation but pointed to their consultation methodologies and tenant liaison structures as models. They emphasised the need to establish residents' committees and to get structured feedback from tenants every 3 months.



Accommodation developed without consultation and having an inadvisable mix of families often result in long-term challenges. This approach should be avoided. Structured communication over a long period from pre-design to ultimate site maintenance is good practice and should be built into the work of local authorities.

Consultation fatigue without results was highlighted as a real challenge. The development of the Local Traveller Accommodation Consultative Committees (LTACCs) as a catalyst for developments and including representatives from potential developments as members of LTACC could assist in bringing more oversight to these situations.

The use of independent facilitation to carry out consultation and engagement processes was suggested as needed. This would require consistent and long-term financing. It was acknowledged that the CENA model works well, but there is a limit to what CENA can do within its current resourcing. It was also recommended that local Traveller support groups need to be resourced to engage in consultation processes.

### 3.3.3 Planning/Location

“Doing it right the first time saves money”.

It was strongly suggested that a needs study/consultation process be adopted before a Traveller Accommodation Programme is completed. The findings from same should also feed into the Planning Authority’s Development Planning Process and the Housing Strategy. Housing assessments should offer all options and allow several preferences to Travellers.

It was identified that the LTACC is a key hub for bringing issues to other policy platforms of the Council and Department including renewal of policies such as, regeneration policy, future land acquisition planning, the Development Plan (associated Housing Strategy) and the Local Economic and Community Plan among others and should be utilised in this regard.

Traveller Interagency Groups should also be utilised in creating a healthy, safe, and conducive accommodation environment.

### 3.3.4 Design

Council staff and consultants need to outline options to consultees to ensure the parameters of the design are understood from the outset. Getting certain facilities may mean loss of others, for example, 2-storey houses allow for larger yards in semi built up areas where a bungalow is not possible. The use of “flexibility within boundaries” approach is an important starting point.

Traveller tenants for the accommodation should be identified early to allow consultation to begin. The varying needs of families need to be considered within a life cycle approach. Also, the use of life-cycle assessment when assessing financial limits/VFM aligns with the national sustainability targets.

It may be useful to consider the range of agencies involved in the design team. For example, local development agencies can assist in developing outside spaces or provide facilities for horses, if required. It was also identified that the Land Development Agency (LDA) does not appear to be including Traveller specific accommodation in its designs. This should be addressed at a national level.

In relation to safety, it was highlighted that a major knock-on effect of providing a parking space for a caravan is that, where this is designated as a caravan parking space, the Fire Officer may determine that the scheme is now a halting site with consequent design implications. Also, Fire Officer requirements differ around the country.

### 3.3.5 Maintenance and Management

The need for properly resourced active management and maintenance programmes on Traveller accommodation was identified. It was universally agreed that local authorities need to be funded for non-construction elements of the consultation and engagement process, including facilities as required. This needs to be agreed at Departmental level.

Developing a shared service for social workers could be a model of support to explore across local authorities to facilitate evenness and continuity of service in each authority area.

## a. Lessons Learned

The supply of Traveller specific and culturally appropriate accommodation schemes needs to be increased. Engagement with Travellers in the design of their accommodation leads to provision for Traveller cultural needs in shared and individual spaces. This is one of the key factors contributing to poorer outcomes for Travellers, unsustainable accommodation and a resulting waste of resources. Travellers are the experts on their own needs and each situation can be different. This needs to be explored with each family as part of the agreement of design. The maxim one size doesn't fit all applies.

In some areas the relationships between Travellers and the local authority could be improved. It was identified through the interviews that trust between the Traveller community and the local authority was key to developing a positive working relationship. Trust can be achieved through building an effective working relationship and by delivering on agreed actions.

Expectations of what can be delivered within the design concept can be managed if there is an effective engagement process in place and decisions about the design are being taken with Travellers. Aspects impacting on the design such as the level of resources and space available should be discussed at the outset so that the parameters are clear.

The high turnover of staff, lack of knowledge of Traveller culture and occasional skills deficits within local authorities contribute to poor engagement processes with Travellers. Often the right people with the expertise and knowledge to work with Travellers are not available. A national training programme on cultural competency is needed to ensure local authorities at any given time have the capacity to work cross-culturally with Travellers. There is scope for further Approved Housing Body activity in Traveller accommodation provision.

## **b. Key Findings from the Consultation**

Broadly, the engagement process undertaken for this report has highlighted a wide range of critical issues, several related to the processes of engagement associated with the four-step approval process. Many of the responses were consistently expressed across local government, Traveller community representatives and other key stakeholders. The key findings of the stakeholder engagement process include:

1. There is a need to align the engagement process for accommodation provision with key decision gates in the 4 step approval process at national level
2. Consultation needs to be appropriately managed and where feasible resourced by using people with the cultural awareness and mediation/consultation skills to underpin engagement with the families and Traveller community generally
3. Design in association with the target communities must allow for pro-active timely flexible engagement between the architect and the community
4. Design must allow a degree of flexibility to cater for minor adjustments following consultations.
5. There is a need to actively approach such design with a clear focus on universality in design across all sites as well as having regard to specific needs of the target communities
6. There is a need to recognise that families have a natural life cycle with older people having at times separate expectations from younger people and vice versa. Design should respect therefore the life cycle of those affected by delivery of accommodation
7. Capacity to easily access local services such as education and retail, employment and health has to be a factor in identifying appropriate locations for accommodation
8. Accommodation needs of the communities and families can be culturally appropriate having regard to density requirements where such provision is aligned to the delivery of wider social and private housing developments
9. Development plans should fully respect the objectives of any future sets of guidelines the Department and/or the Office of Planning Regulator may issue

10. Fire safety and other health and safety obligations, as set out in national legislation, need to be fully embedded into design. Maintenance programmes should also apply full regard to such requirements.

The fieldwork and consultations carried out for this research demonstrated that the core aspect in ensuring the effective delivery and long-term sustainability of Traveller accommodation is consultation and effective regular engagement with Travellers regarding the location, design, delivery and management of their accommodation. This is vitally important as local authorities will be working cross-culturally with a community whose cultural identity and accommodation needs are distinct and different from the majority population.

Throughout the fieldwork for this research, fears were expressed about the risk of engagement in consultation with Traveller families and as such raising their expectations of what can be delivered which could lead to increased costs and become impossible to deliver. However, the fieldwork also found that this risk can be mitigated if a robust consultation and engagement process is put in place from the outset which sets out the parameters and costs for the project. It was found that in all cases, the expectations and needs of Travellers can be delivered in a culturally appropriate way while staying within budgets.

Furthermore, in some cases, there were concerns that some local authority staff may not have the knowledge of Traveller culture and the skills necessary to engage meaningfully with the community on the development of their accommodation. This concern can be mitigated by training to understand Traveller culture and their needs and upskilling on conducting meaningful consultation and engagement processes. In some cases, a skilled facilitator could be used to coordinate the engagement and consultation process with Travellers where there is an absence of expertise.

During the fieldwork, a number of case studies were identified that showed good practice in conducting aspects of consultation and engagement with Travellers on their accommodation. In a number of cases, culturally appropriate accommodation had been designed, delivered and managed successfully. The key element that was attributed to this success was a positive consultation and engagement process had taken place and constructive relationships based on trust and respect existed between the local authority and the Traveller families.

## 4 Research Recommendations

Based on this research, the following are the proposed recommendations:

### 4.1 Revised National Guidelines Framework

1. The provision of Traveller accommodation in non-zoned rural areas will generally be governed by existing national planning regulations and guidelines around such development.
2. It is recommended that suitable site locations be agreed by elected councils at the preliminary drafting of a Development Plan. In the event of this not being possible, adequately worded objectives in the draft Plan should ensure that multiple choices are available for such sites with appropriate zoning during the lifetime of the subsequently adopted Development Plan. This should be undertaken in coordination with drafting of the Local Authority Traveller Accommodation Plan (TAP).
3. The creation of the TAP offers an opportunity to comprehensively plan Traveller accommodation by allowing for current and future needs based on recent census and other needs assessments. This should be carried out in conjunction with or prior to development plan drafting. Ideally the 2 processes (TAP and Development Plan) should be sequenced in an effective manner (e.g., TAP preceding Development Plan).
4. Provision for Traveller accommodation should be included as a separate mandatory element of the housing strategy which will be prepared as a development plan is being drafted.
5. Consultation and stakeholder engagement revealed an increasing preference of Travellers to be close to an urban setting and the services it offers. In general, construction in isolated areas should be avoided unless it is a response to an expressed desire and subject to planning restrictions in rural areas. This may vary on a case by case basis. For single/small developments of rural housing the principals in these guidelines provide a template for use.

6. Ideally, Development Plans should identify locations for Traveller accommodation.
7. Life Cycle Design should be applied to all Traveller accommodation. Units should be future proofed to ensure that the current build, or additional build on the unit site, will cater for reasonable future need. An awareness needs to be developed, in particular around current and future health needs, likely family size increase or decrease and catering for older Travellers or those with a disability. This is particularly applicable in halting site design as current trends suggest a preference to live in warmer and more comfortable accommodation.
8. Consultation with members of the Traveller community and Traveller support groups including the LTACC Traveller representatives is required prior to completion of the TAP. The TAP will identify the location and nature/type of appropriate accommodation as part of the consultation process for the TAP and the recommendations set out in the TAP will be embedded into the relevant Development Plans applicable and to the Housing Strategy for each Planning Authority.
9. Similar engagement during the formation of the Development Plan should take place. This could be combined with the previous consultation undertaken for preparation of the relevant TAP.

#### **4.2 National Planning Policy Amendment**

1. Every effort should be made to meet current density standards set down by DHLGH. However, in many cases the density guidelines may not be met due to local environmental conditions. (e.g., in many halting sites where necessary facilities such as parking, play area, enterprise space, etc.). Parking facilities for caravans, single storey accommodation, fire regulations, individual housing units will have a similar result.
2. The design of Traveller accommodation in densely populated urban areas may need to be considered in a different manner compared to suburban, town outskirts locations. Innovative possibilities should be discussed with the families in very built up areas and different models considered including during consultation (e.g., 2 storey homes, possible parking for caravans, etc.)

### **4.3 Fire and Safety**

1. Current and future regulations and guidelines related to fire and safety shall be fully applied.
2. Where feasible and possible, in group housing and halting site developments, space should be considered, subject to confirmation at consultation stage, for vehicular access to rear and caravan parking space. In very exceptional cases (e.g., in group housing in a city environment) a separate secure compound for caravan parking could be provided nearby to facilitate travelling. Fire restrictions will apply where a caravan is placed on site curtilage.

### **4.4 Local Planning and Housing Policy Amendment**

1. Converting halting sites to group housing schemes may have unintended consequences due to the difficulty faced by local authorities in procuring acceptable zoned sites/getting approval to dispose of land for new halting site developments under the part 8 process. A strategy around standalone halting site provision needs to be included in the relevant development plan that facilitates future provision of sites for halting site, group housing developments, and hybrid sites to meet future needs.
2. An area of between 10% and 20% of a current or planned development area, if available space permits, should be set aside for future demand. This land should be securely fenced off.

### **4.5 Development of cultural awareness in local agencies and local representatives**

1. In order to promote trust between Elected Members, Officials and Travellers, specific awareness training should be provided to Elected Members, Officials and Travellers representatives on the LTACC. Such training should also have regard to the need to meet awareness levels in those retained by the local authority or AHB to deliver Traveller Appropriate Accommodation. Consideration of applying a similar approach to the training programme delivering awareness on climate change might be appropriate.



#### **4.6 Local to national policy interface and underpinning processes including approval process for project delivery**

1. The factors arising from living conditions in Traveller accommodation should be assessed at an early stage in the local planning process including the preparation of the TAP. Provision planned for families with special needs and identifiable inherited illnesses should also be fully determined in the TAP process. Existing pathways to plan and fund specialist health and environmental provision should be cross referenced with the public health authorities in the course of a local authority planning a TAP.
2. The provision of Traveller-specific accommodation is extremely resource intensive, especially for those local authorities with limited general income and increased funding for Traveller-specific accommodation needs to be supported annually
3. Liaison with other key stakeholders (e.g., Gardai, HSE, Education, Enterprise, Social Welfare, etc.) should be continuously carried out to ensure that joined up solutions addressing accommodation provision and security for the Traveller community. It is envisaged that such engagement should be made by the local authority using its existing structures. In some cases, use of local interagency Traveller Support Groups may be appropriate.

#### **4.7 Future Studies**

It is recommended that the following be considered for future research.

1. Consideration should be given to the feasibility of implementing a policy to provide expert advice around design/standards to Travellers wishing to develop their sites (including ownership/tenancy). Systems to be designed to facilitate the compilation of data from LAs (for example, progression of the Traveller Accommodation Programme and constituent projects) in a timely, consistent, and comprehensive manner with feedback loops established at the centre to LAs.

# Part 2: Proposed draft guidelines and good practice for the delivery of Traveller accommodation

## 5. Overview

### 5.1 Introduction

In 2017, the Irish state officially recognised the Traveller community as an ethnic group within Irish society. This recognition was a significant milestone in acknowledging and affirming the distinct cultural identity and heritage of the Traveller community in Ireland.

The provision of Traveller accommodation falls under the aegis of the local authorities in Ireland. It is generally accepted that such provision has been one of the most challenging of all local authority building programmes. The very poor living conditions on many halting sites has been highlighted in many reports and research.<sup>19</sup> Such conditions in Traveller accommodation fail in terms of providing a sustainable solution adequately accommodating the Traveller community.

The aim of these proposed draft guidelines is to assist local authorities in developing needs assessments, briefs, site assessments and to list principles and considerations in developing culturally appropriate designs for Traveller accommodation programmes.

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<sup>19</sup> Final Report of the Joint Committee on Key Issues affecting the Traveller Community - 2021

## 5.2 Culture

Traveller culture, like any culture, cannot be neatly defined. “Culture is not static and solely based in the past, but an interplay between tradition and emerging new ideas.”<sup>20</sup> Culture is an ever-evolving construct, but it is felt by the people who share this identity and affects behaviour, social norms, and expectations around shelter and settlement.

While ‘Traveller culture’ is referenced extensively in the published literature and in the research for these proposed draft guidelines, it would be a mistake to assume that only Travellers have a ‘culture’. All people have a culture including the designers and architects formulating briefs and proposing schemes. It is helpful for designers to keep this in mind when developing schemes that respond to different cultural cues.

Nonetheless, imperatives around ecological and environmental concerns, cost, planning, urban realm and placemaking are still entirely relevant, and these guidelines will build on existing guidance and studies to describe an approach to the development of culturally responsive homes.

## 5.3 Why Community Engagement

Community engagement is a powerful tool, enfranchising participants and allowing a collaborative process to develop. In the case of Traveller-specific accommodation, working cross-culturally will require designers to have meaningful engagement with the community and residents for which the development is intended. In this research it was observed that families living on successful sites are compatible and seem to have a significant degree of engagement with the local authority in the management and running of the site. This autonomy and enfranchisement allows Traveller input into many aspects of the site, including allocations and maintenance.

Chapter 8 elaborates on the methods and considerations for engagement with Traveller communities and draws on the recently published *A guide for inclusive community engagement in local planning and decision making* (2023).

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<sup>20</sup> [Irish Traveller Movement](#)

Where early and participatory engagement is conducted, it is expected that not every Traveller household will have the same preference, nor expect their accommodation to express a cultural identity in the same way. A number of Traveller households and families may continue to express a preference for ‘standard’ housing, which should be respected, and the family’s cultural identity should be supported through tenant engagement policies, allowing integration into their neighbourhoods without the need to abandon their culture and identity. In other instances, a household or family may express a preference to resume a nomadic lifestyle. This is the subject of separate research on transient sites, and guidance on this accommodation type is not included in these guidelines.

This guidance, therefore, will seek to identify some of the characteristics of designs for group housing and halting sites that respond to, and support, a cultural identity in Traveller-specific accommodation.

Travellers stand out as a group that experience extreme disadvantage in terms of employment, housing and health<sup>21</sup> and that faces exceptionally strong levels of prejudice<sup>22</sup>. It would be important to manage sensitively any wider consultation involving the general population in relation to Traveller appropriate accommodation and emphasise the positive contribution that Travellers make to Irish society.

#### **5.4 Accommodation Type: What does Traveller-specific accommodation mean?**

The Annual Traveller Estimates 2017 – 2022 indicate that a majority of Traveller families accommodated by local authorities are in ‘standard housing’ (c.80%), although a significant proportion also live in group housing and on halting sites. Outside of local authority provision, private rented accommodation is the next most prevalent category. There is also a broadly consistent number of families living on ‘unauthorised sites’.

Traveller specific accommodation typically refers to the provision of housing or living arrangements designed to accommodate multiple Traveller families or households within

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<sup>21</sup> Nolan, B. and Maitre D. (2008) A social portrait of communities in Ireland; Department of Health and Children (2007), All Ireland Health Survey, doi: <http://www.ucd.ie/issda/datasetsintheissda/allirelandtravellerhealthstudy/>.

<sup>22</sup> MacGréil, M. (2011), Pluralism and diversity in Ireland: prejudice and related issues in early 21st century Ireland.

a shared or communal setting. It is an alternative approach to individual or dispersed housing for Traveller communities.

Section 6.3 of the NPF is clear in acknowledging the different ways of life in the Traveller community. While not all Traveller lifestyles are the same, some Travellers have particular housing needs, related to economic activity and kinship. There is also a requirement to accommodate nomadism, for at least part of the year in some cases. The NPF urges local authorities working with the Traveller community should continue to address the specific needs of Travellers on a case-by-case basis, ensuring that targeted provision is achieved in line with those needs and that this is also incorporated into housing and Traveller accommodation strategies, city and county development plans and local area plans.

Traveller-specific accommodation can take various forms, including:

1. Traveller group housing schemes: These are purpose-built housing developments specifically designed to accommodate multiple Traveller households in adjacent houses. These schemes often feature a cluster of housing units and sometimes a hybrid site with caravan/trailer pitches arranged in a centralised location.
2. Traveller halting sites: Halting sites are designated areas or sites where groups of Traveller families can station caravans/trailers or mobile homes. These sites typically provide basic facilities such as water, toilet and waste disposal facilities, communal spaces, and sometimes amenities like playgrounds or community buildings. Many sites provide day houses which accommodate daytime activities while sleeping still occurs in caravans/trailers.

Group housing can also be provided as part of a wider social housing scheme through a mixed social housing/Traveller accommodation development or as a Part V scheme.

The aim of housing initiatives for Travellers is often to provide adequate culturally appropriate accommodation options that address the specific needs and preferences of the Traveller community. By offering communal or shared facilities, these housing arrangements aim to foster a sense of community, facilitate social interaction, and provide support networks within the Traveller community.

However, these ambitions are not always achieved, for example, a study by The Housing Agency (2014<sup>23</sup>) identified a number of reasons why this is the case. Almost half of respondents in that study cited internal tensions, feuding and family incompatibility as reasons for leaving, although there are also several other reasons cited in the study including personal, health, overcrowding, and poor maintenance and substandard conditions on sites over an extended period.

## 5.5 Current Design Guidance

### 5.5.1 Guide to Fire Safety in Existing Traveller Accommodation (2019)

#### **National Directorate for Fire and Emergency Management**

Designers should be aware that The National Directorate for Fire and Emergency Management *Guide to Fire Safety in Existing Traveller Accommodation (2019)* should be applied with respect to fire safety, ventilation, electrical and LPG standards where mobile homes, caravans/trailers or other temporary dwellings are proposed. Where provision is made for a touring caravan on curtilage, the local fire officer may require that the separation distances and/or structures are observed, even where it is not intended that the caravans are occupied.

### 5.5.2 BS3632:2023 Specification for Residential Park Homes (2023)

#### **Caravans/Trailers, Mobile Homes, Temporary Dwellings**

This guide will not make recommendations on the design of temporary or mobile units such as mobile homes, caravans/trailers, wagons, or modular demountable accommodation, as they are not governed by building regulations and, at the time of writing this report, caravans/trailers are funded by the Department for Housing, Local Government and Heritage only in the form of a repayable pilot Caravan Loan Scheme. This type of accommodation will frequently form part of Traveller specific accommodation programmes and understanding the existing regulations with respect to separation distances and principles of fire safety<sup>24</sup> contained in the above is critical in developing site layouts.

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<sup>23</sup> The Housing Agency (2014), *Why Travellers leave Traveller specific accommodation*

<sup>24</sup> The National Directorate for Fire and Emergency Management (2019) *Guide to Fire Safety in Existing Traveller Accommodation*

Other studies around caravan design and standards, however, do exist and an understanding of the interrelated issues of mobile and temporary unit type, energy poverty and sustainability, together with the cultural connotation of temporary dwellings is an important factor to consider in designing sites where temporary dwellings will be sited.

BS 3632:2023 is the only normative standard for residential park homes intended for year-round occupancy. This standard requires minimum u-values for building elements among other requirements, such as integrated sanitary facilities, which would align with the aims of national and European housing policy and transition to low-carbon and (N)ZEB housing stock.

There is an inconsistency, however, between a transition to a low-energy, high quality, living environment for Travellers living in mobile homes, and national housing policy requiring “key elements of construction [to] have a service life in the order of sixty years without the need for abnormal repair or replacement works.”

Residential Park Homes designed for year-round habitation conforming to BS 3632:2023<sup>25</sup> are commercially available with a design life of between 30-50 years. When compared to the Basic Unit Costs (BUCs) for a detached social housing unit, an energy efficient mobile home could be replaced two or more times over a 60-year period within the same cost envelope.

Reconfiguration, extension, adaptation of a social housing unit is typical and necessary over a timescale of sixty years<sup>26</sup>. A house built in 1964 will not meet current minimum requirements for habitation; it would not, for example, have central heating. Similarly, a household’s needs will change over this period and where adaptation of a housing unit is not possible, in an apartment for example, it becomes necessary for a tenant or household to seek new accommodation.

Replacement of a mobile home offers a different model of adaptability. A mobile may be replaced by a larger, or smaller unit, or may be placed in a different location on the same site, reflecting the traditionally flexible accommodation patterns of the Traveller Community.

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<sup>25</sup> BS 3632 was updated in 2023 taking account of embodied carbon and sustainability standards.

<sup>26</sup> Irish Independent (2023), <https://www.independent.ie/regionals/dublin/dublin-news/almost-10000-dublin-city-council-homes-get-retrofitting-upgrade/42363617.html>

Further consideration and research would be required on the viability of recognising periodically replaced, energy efficient, small footprint modular homes as an appropriate accommodation model, and thus eligible for capital assistance funding through local authorities and AHBs. Such research would need to address build standards, embodied carbon, end-of-life re-use, refurbishment and recycling possibilities, supply chain security and regulation of standards, as well as residual asset value and cost.

### 5.5.3 Modern Methods of Construction, Introductory Guide (2023)

#### **The Department of Housing, Local Government and Heritage**

There has been an advancement in several aspects of MMC in recent years and the CIC, OPW, RIAI, and numerous stakeholders in both public and private sectors have been researching and investing in this area. The Department of Housing has issued an introductory guide to help contracting authorities and specifiers understand the various categories and terms.

MMC in Ireland aims to provide building regulation compliant, high quality, rapid build homes, offering a 60-year structural design life. In this respect the aim differs from that described in the periodically replaced Residential Park Home model. Nonetheless, it is anticipated that MMC and, particularly, Category 1, 3D volumetric off-site construction could have a role to play in meeting the urgent need for high quality accommodation on many sites where Traveller specific accommodation programmes are proposed.

Where a unitised, or other category of MMC, is proposed, it should be discussed with the Traveller families at the earliest stage of a project, as it will affect design, procurement, and delivery of the project. Future expansion and adaptability in modular unitised construction can be difficult and a knowledgeable discussion around the benefits and potential drawbacks of modular construction should form part of the discussion.

Customisation of unit designs within the technical parameters of an MMC system can only be fully agreed after a supplier is appointed. It will be important, therefore, that the outcome of the initial engagement with the Traveller group is recorded and forms part of the Invitation to Tender requirements.



Continued community engagement should form part of the delivery requirements and of the qualitative assessment. Further guidance on this is included in Chapter 8.

#### 5.5.4 Design Manual for Housing (2022)

**Department of Housing, Local Government and Heritage.**

#### 5.5.5 Quality Housing for Sustainable Communities (2007)

**Department of the Environment, Heritage, and Local Government.**

With respect to Traveller specific housing, the assessments and processes described in *Quality Housing for Sustainable Communities (2007)*, and the *Design Manual for Quality Housing (2022)* when understood in the context of a different cultural perspective, continue to be relevant and local authorities and design teams should continue to refer to this guidance.

The 2007 Guidance identifies ‘Essential Requirements’ of Quality Housing as follows:

It is considered that good quality, sustainable housing development should be:

#### **Socially and environmentally appropriate**

The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental, and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces.

This policy is entirely consistent with the provision of Traveller accommodation. The mix of tenure under this policy will need to understand family compatibilities and dynamics, which should be established at the outset. Smaller developments, comprising 6 to 10 units/pitches, function well. Developments of more than 15 units/pitches can present management challenges.

### **Architecturally appropriate**

The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.

The architectural response should enhance a cultural identity, and seek to integrate with the surrounding context, making a positive contribution to the surroundings and environs in which the development is placed.

### **Accessible and adaptable**

There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.

This policy is hugely important for all sections of the population, including Travellers. Particular attention will be required under this policy in the context of halting sites.

### **Safe, secure, and healthy**

The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.

Strong emphasis on natural surveillance and good quality public lighting should form part of any Traveller specific accommodation, as well as safe places for children to play. This policy will need careful consideration when applied to the design of halting sites.

### **Affordable**

The scheme should be capable of being built, managed, and maintained at reasonable cost, having regard to the nature of the development.

It is seen across the sites visited that management and maintenance costs are significantly less on Traveller specific schemes where a constructive relationship exists between the local authority and the tenants and families. This re-emphasises the importance of the core finding of early engagement and building relationships.

### **Durable**

The best available construction techniques should be used and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.

All construction work must comply with the building regulations as a matter of course and it is the duty of the Assigned Certifier to certify compliance with these standards. However, for a scheme to endure for sixty years, it must be fit for purpose and adaptable. A scheme that is either unfit for purpose or incapable of adaptation has very little chance of enduring any significant timescale. Designs for group housing and halting sites should consider future adaptability and sustainability of tenancies as a core requirement.

### **Resource efficient**

Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and optimise the benefits of sunlight, daylight and solar gain; optimal use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.

Energy efficiency should form part of the earliest discussions, as must unit density and land use, which will be reviewed in Chapter 6. A wood-burning, or solid fuel stove/fireplace is a common desire for most tenants, however this feature is incompatible with energy efficient homes. Where highly insulated building fabric is constructed in line with current building regulations, and an energy efficient heating system specified, issues around fuel poverty reduce significantly.

### **5.6 Cost and Value for Money**

It is acknowledged that several of the recommendations in these proposed draft guidelines will have budget implications, both in terms of early community engagement and in the finish and design of the developments themselves.

As identified in the Key Finding of this report, early community engagement, starting before a Stage 1 submission is made, will carry a very large benefit relative to the cost and it is recommended that this engagement is funded through the payment of fees for this work. Early, effective, and consistent engagement builds trust and empowers the communities to be active in the management of their own development. This single aspect is among the most significant features of a successful scheme, reducing maintenance and vacancy costs. Chapter 8 gives further guidance on community engagement.

Abnormal costs will generally be identified in Project Review submissions to the department in all social housing developments. Where a Traveller specific project involves the redevelopment of an existing site, abnormal site costs will frequently include demolition of existing structures or halting bays, and/or site decontamination/remediation, as many existing Traveller sites were historically placed on unsuitable made ground, former dumps or otherwise contaminated or unusable land.

In addition, some site and design features that are regularly identified as core to Traveller culture may result in costs that exceed the applicable basic unit costs. These include a

preference for paved yards over gardens, vehicular access to the rear of the unit, space for sheds, often resulting in a very low density on the site. Such features will carry costs that are unlikely to be offset through design rationalisation in other aspects of a scheme. These Traveller-specific features should be identified separately in cost reports that are submitted as part of the capital approval process. It is recommended that some additional capital funding should be made available for these features of Traveller-specific programmes, on a case-by-case basis, relative to the Local Authority Basic Unit Costs (BUCs), balanced with the priority of the available budget to accommodate families.

There are some aspects of Traveller culture referenced in these guidelines that are relevant to the design of Traveller specific accommodation but that will not attract funding from a housing budget, such as facilities for animals, community facilities and installations, and/or sheds and enterprise spaces. It will be important for design teams and Local Authorities to consider how these kinds of features, where they are to be provided, might affect site layout, unit design, and so on. However, the design teams and Local Authorities will need to be clear that the actual delivery of elements not directly associated with the provision of housing will require a separate source of funding and, where applicable, a separate design team appointment. Local Authorities will need to ensure that all associated works/costings for (1.) Residential Works and (2.) Non-Residential Works such as community facilities etc. are clearly identified separately within Cost Plans/Pricing Documents and budget applications.

## **6. Proposed Design Principles and Guidance**

### **6.1 Overview**

A process of engagement with the Traveller community is proposed in these guidelines, offering a format of principles, considerations, and recommendations. In providing this kind of framework to local authorities, it is hoped that each design solution will have the ability to meet the specific needs of the prospective residents, reflect cultural cues, and support cultural identity, without applying a template or a generic repeat design solution.

## 6.2 Community Engagement

### 6.2.1 References:

- *Design Manual for Housing, 2022, Section 2 – Design Brief*
- *Quality Housing for Sustainable Communities, 2007, Section 2 – Design Brief, Procurement and Cost Control*
- *A Guide for Inclusive Community Engagement in Local Planning and Decision Making, 2023, Department of Rural and Community Affairs*
- *Consultation Principles & Guidance, 2019, Dept of Public Expenditure and Reform*

### 6.2.2 Principle

**“The story that the architect hears, isn’t our story.”**

(Traveller view, where consultation occurred without the architect ever meeting the Travellers)

**“I don’t speak for every Traveller. We all have different ways. I know my own family and I can speak to that.”**

(Traveller view)

- A Traveller specific development will meet the needs of its inhabitants when it has the potential to express their culture and aspirations. Working cross-culturally will require designers to have meaningful engagement with the community and residents for which the development is intended.
- Where early and participatory engagement is conducted, it is expected that not every Traveller household will have the same preference, nor expect their accommodation to express a cultural identity in the same way.
- Meaningful community engagement has the potential to bring about lasting partnerships on site between Traveller communities and the Local Authority Landlord.

### 6.2.3 Considerations

- Is there a preference for houses or halting bays, or a hybrid mix of both?
- What people will live at this site? Do their families get on and are there tensions or historic issues that need to be considered? Do they want to live together?
- Once initial proposals are available, it will be important that the residents have an opportunity to engage with the design development and give meaningful feedback.
- Is there a community facility required, and how will this be funded and managed? Examples include a hall, a homework club, or a chapel. Could this facility be easily adapted for other purposes should the need arise, for example, as an enterprise space?
- If space is limited, can nearby community spaces be used?
- Following the consultation, is the brief clear and accessible? Is it realistic and achievable? Early assessment of likely cost will help decide what is possible, and early clarity of what is achievable.
- Conducting a needs assessment can be difficult and care should be taken to ensure that the voices of the prospective tenants and households are heard.

### 6.2.4 Recommendations

- Refer to the proposed consultation guidelines included in Chapter 8. The aim will be to establish a meaningful engagement with the residents of the proposed scheme, and to deliver a series of agreed milestone signoffs aligned with existing statutory and department delivery mechanisms.
- On existing sites, and where the residents of a proposed new scheme are known, initial consultation and community engagement should always be carried out prior to any design brief being established and prior to commencement of design for funding or statutory approval.

## 6.3 Site selection

### 6.3.1 References:

- Chapter 7 of these proposed guidelines
- *Design Manual for Housing*, 2022, Section 1 – Site Selection
- *Quality Housing for Sustainable Communities*, 2007, Section 1 – Site Selection
- *Design Manual for Urban Roads and Streets (DMURS)*, 2019 <https://www.dmurs.ie/>

### 6.3.2 Principle

#### **“Integration, not assimilation.”**

(Traveller view)

- Group housing schemes and halting sites should be liveable places where integration with the surrounding area is possible, and supporting amenities and services are available.
- In many instances, Traveller accommodation programmes involve the redevelopment of an existing Traveller specific group housing or halting site as well as remodelling or extensions to existing sites. In these instances, opportunities should be explored to make the site visible in its context and make a positive contribution to the receiving environment.

### 6.3.3 Considerations

- Can the site meet the Traveller’s needs? Is the site suitable? In the case of existing sites, consider the established social and economic networks of the people living here.
- Proximity and connectivity of a site to amenities and services will greatly affect the quality of life of the people who will live there. A structured assessment of the viability of a site during initial community engagement, such as the site assessment tool, will be helpful.
- What are the current Development Plan Objectives for the area? Local Area Plans and the Local Authority Development Plan will give an insight into future infrastructure projects that may affect the site. Review for opportunities to improve access and connectivity.



- Consult with local authority roads, waste, and ecology/habitat departments, and with Uisce Éireann, to gain an understanding of the challenges and opportunities that may exist around a site.
- Consult the *Design Manual for Urban Roads and Streets* (DMURS) with respect to traffic, pedestrian, and cycle connections to and from a site. Appropriate site lighting is also essential.
- In the case of existing sites, assess the extent of ground remediation where this may be required, and any other risks to health or the safe use of the site. Gain an understanding of the probable abnormal costs as early in the process as possible.
- Do the residents who will live on the site keep horses? Can the site support horse stabling and grazing, having regard to the Animal Health and Welfare Act (2013) and is it consistent with the Development Plan and existing adjoining residential amenity? Can funding be sourced from the appropriate body? Are there adjacent or nearby facilities, like a local horse project?

### 6.3.4 Recommendations

- Traveller accommodation has historically been placed in peripheral and marginal sites and locations, on contaminated land or beside utility infrastructure. These sites are usually unsuitable for a residential development but, further, create a separation and disconnect between the residents on the site and the wider community. New and redeveloped sites should seek opportunities to be open and visible to the wider context.
- Ensure water pressure is sufficient on new sites to adequately supply fire hydrants and that there is safe access/egress for emergency vehicles.
- The use of high walls which isolate the public spaces of a group housing scheme or halting site should be minimised. In general, the site should have an open aspect in relation to its neighbourhood and the housing units be visible to nearby residents.
- New sites should be located where amenities are close by in line with good practice in site selection.
- A site lighting design or assessment, with calculated lux levels, should be prepared for every development, including halting sites.



## 6.4 Site Layout

### 6.4.1 References:

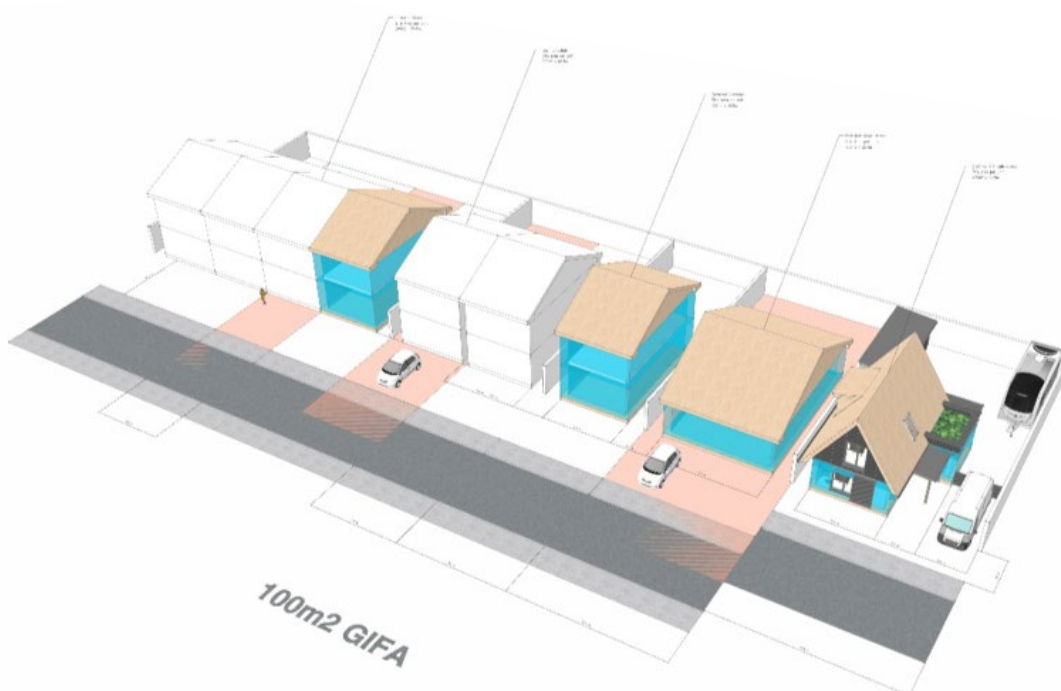
- *Design Manual for Quality Housing, 2022, Section 3 – Urban Design and Master Planning*
- *Sustainable Residential Development and Compact Settlements, 2024.*
- *Quality Housing for Sustainable Communities, 2007, Section 3 – Urban Design Objectives in the Provision of Housing*
- *Design Manual for Urban Roads and Streets (DMURS), 2019*
- *Technical Guidance Document M, 2022 (TGD M) – Sections 3.1 & 3.2.*

### 6.4.2 Principle

- A site should be arranged to provide maximum advantage of its setting. Where possible it should enhance and strengthen the fabric of the surrounding area.
- The layout of public and private spaces should ensure safe, useable spaces for all with good active frontage/passive observation. Landscaping and community facilities offer an opportunity to connect to the wider context as well as presenting a positive aspect of which residents can be proud.

### 6.4.3 Considerations

- A site should have safe pedestrian and vehicular access and full advantage should be taken of the guidance and principles in DMURS. Where appropriate, consider access for larger vehicles, and vehicles towing a caravan/trailer.
- An internal loop road layout is a feature of many successful schemes. It offers easy vehicular circulation and an alternative route to accessing individual units or bays, as well as presenting an opportunity to form a central amenity space. Loop roads also greatly assist access for fire and emergency services, although this feature in smaller schemes or on tighter sites may not be practical.
- Generally, the use of height barriers restricting access to sites should be avoided. These are sometimes desired to prevent unauthorised access onto the site, but the use of restrictive and coercive features on a site can project an image of negative stereotype and isolation. They can also pose a risk, preventing access to emergency services and first responders.
- The density ranges proposed in the Sustainable Residential Development and Compact Settlements Guidelines may not always be achieved in Traveller specific schemes, however efficient use of land and resources should always be considered.



- Assess the surrounding context. Are there opportunities to integrate the development into the surrounding area? Often a community building or facility can present an opportunity for integration and can provide a focal point, or entry point, to the scheme.
- The form & massing of the buildings and built structures, together with the landscaping will contribute to the sense of place.
- Communal spaces for planting have been raised in this research – review with residents if this is desired and can be accommodated on the site.
- Is a playground needed/wanted on site and is there adequate space for children to play on the site or in the immediate area?
- Are there natural features that may enhance the setting and could be retained?
- Future expansion can be a difficult consideration. This can be viewed positively when residents feel that they have a voice in the allocation process. Future expansion could also be temporary expansion. Often a teenage son or a newlywed couple will live in a mobile home in the same development as a parent on a temporary basis while they find their own accommodation.

#### **6.4.4 Recommendations**

- Where a community support building is included, subject to the local authority securing funding for it, it should be near the front of the site and visible and, ideally, available for uses in the general community as well as Traveller specific programmes.
- Waste collection, segregation and storage should be considered in the scheme design.
- Traffic calming measures should always be included, but concrete bollards and other heavy, non-residential, traffic control measures should generally be avoided.
- Circulation within the site should be safe and secure for people and children, the environment healthy, and the layout should afford good passive surveillance.

- There should be adequate amenity and play spaces for the residents of the scheme.
- Housing and community facilities should be accessible, and the requirements of Building Regulations, Technical Guidance Document M should be met as a minimum.
- Generally, a capacity for expansion of between 10 - 20% should be considered, whether in the provision of an additional pitch on a halting site or identifying a possible future site within the development. Great care should be taken in this instance, however, to ensure that ownership and entitlement to occupy the additional pitch does not become an issue of conflict on the site. Similarly, fallow spaces should be overlooked, landscaped, and active where possible, to ensure the vacant pitches do not become areas of anti-social behaviour.

## 6.5 Dwelling Mix

### 6.5.1 Principle

**“What makes it work well is the company. Everyone watches out for everyone”.** (Traveller view)

### 6.5.2 Considerations

- Schemes where the residents are compatible are far more likely to be successful sustainable places to live. Inter family tensions can have a devastating effect on a Traveller specific scheme and, most importantly, on the people who live there.
- When Traveller households can engage with the running and management of the site, a sense of ownership and pride can emerge, making the site run smoothly and reducing operational cost for the local authority.
- Smaller schemes with a limited number of pitches or units can foster a sense of community and cooperation.

### 6.5.3 Recommendations

- In approaching a new scheme, it will generally be appropriate to provide 6 to 10 units or pitches per site. In some cases, more units may be appropriate, however this should be agreed with the prospective residents in the context of allocations and future planning. Where space permits a future expansion of 10 - 20% may be considered.

## 6.6 Curtilage

### 6.6.1 Reference:

- *Guide to Fire Safety in Existing Traveller Accommodation*, 2019
- *Design Manual for Quality Housing*, 2022
- *Design Manual for Urban Roads and Streets (DMURS)*, 2019
- *Employer's Requirements*, (2020)

### 6.6.2 Principle

**“The council think I want a mansion, but I don’t. I just need a bit of space in the yard for himself. He’d go mad if he could not do his work out the back.”**

(Traveller view)

- Travellers consulted in this research have expressed a strong connection with outdoor living. Socialising, events, and cooking often happens outdoors. A successful scheme will generally have well considered outdoor spaces that enhance the quality of the internal spaces or mobile homes.
- Sheds often fulfil a deeply important role in Traveller culture, operating as utile storage but, also, a secondary social space where, generally, men gather and socialise outside of the mobile home or house.

### 6.6.3 Considerations

- The main outdoor space does not always need to be a planted garden and frequently the preference is for a paved yard. Placing the main living space with strong visual links to the main outdoor social space can greatly enhance the quality, usability, and safety of this space. Consideration will need to be given to Sustainable Urban Drainage (SUDs) principles in the context of the overall site and flooding.

- A simple covered area, like a veranda or covered gallery, outside the main living space can greatly enhance the connection from the indoor space to the outdoor social space. Such a feature may be limited by available funding.
- Consider lighting to external spaces.
- Sheds, where these are included subject to the design guidelines on sheds/storage, are as much social spaces as they are storage space. Consideration should be given to allowing for space so that these can be placed adjacent to the main outdoor space with due care in respect of occupant life safety, means of escape and fire spread between buildings.
- Very often in group housing schemes there is a desire to keep a touring caravan, as distinct from a mobile home, on curtilage. This is an expression of a cultural connection to nomadism. *The Guide to Fire Safety in Existing Traveller Accommodation*, 2019, has very specific requirements with respect to separation distance and access for fire services to mobile homes, which will apply if the caravan is ever to be occupied while parked on curtilage. Design Teams should consult with the local authority Fire Officer where on-curtilage touring caravans are proposed.
- Is vehicular access to the rear yard important and, if so, how will this be managed?
- Home based commercial activity will need to align with local authority development plan policy, and generally this is only permitted where their nature and scale demonstrate that they can be accommodated without detriment to the existing residential amenity.

#### 6.6.4 Recommendations

- Travellers consulted in this research have expressed a strong connection with outdoor living. Designers should consider strong visual and physical connections to outdoor spaces from the principal living and kitchen spaces, such as large sliding doors and large windows depending on cost considerations.

- Designers should consider the arrangement of external spaces relative to sheds/space for sheds, living spaces and social activities.
- Proposals for external lighting should form part of every scheme. This will be especially important where halting bays are included in the development and appropriate lighting between the day unit and the caravan/trailer should be provided.
- While current department policy does not fund sheds in general housing, it is permissible under section 5.2.2.5 of DMfQH for up to 50% of the storage requirement to be provided in a secure external store. This should be explored in developing the unit designs.
- Where a specific space is allocated for a touring caravan, designers should consult the local fire officer. Touring caravans on curtilage should not be occupied, and where the potential exists that a caravan may be occupied, the provisions of the National Directorate for Fire and Emergency Management guidance will apply.
- Vehicular access to the rear yard may be considered in limited circumstance and on a case-by-case basis.

## 6.7 2-storey dwellings

### 6.7.1 Principle

- A 2-storey building uses half as much land as a single storey building with the same floor area.

### 6.7.2 Considerations

- In group housing schemes, the type of dwelling proposed, whether single storey, 2-storey, detached, semi-detached, duplex, apartments or terraced, will greatly affect the amount of land required to provide the same accommodation.
- In some instances, a preference for single storey units is expressed as it is felt that this is closer to living in a mobile home or caravan/trailer. However, this should be examined carefully, particularly in the context of the space remaining on the site. Single storey dwellings are very space consuming and will occupy significantly more of the



available land than a 2-storey unit would. A single storey unit will result in less outdoor space available to the dwelling. A 2-storey option may be acceptable, and should be explored with residents, where this offers a benefit in the potential land available for a yard, shed or garden, and a better connection to the outdoors for the principal living spaces, with bedrooms designed at 1st floor.

- Where a 2-storey solution is proposed, one bedroom at ground floor will facilitate accessibility and future proofing.
- Consider the surrounding context and building. Will the proposal be coherent with the surrounds and will it project a positive aspect for the proposed development.

### 6.7.3 Recommendations

- Discuss site use and building type in early consultations.
- Where 2-storey buildings, or higher, are considered acceptable these solutions should be explored on the site.
- The relationship between the building and the curtilage should be explored with the residents.

## 6.8 Space Standards

### 6.8.1 Reference

- *Quality Housing for Sustainable Communities (QHFSC)*, 2007 – Section 5.
- *Design Manual for Quality Housing*, 2022 – Section 5.
- *Employer's Requirements by DHLGH* (2020)

### 6.8.2 Principle

**“The floor area is such an influence on the cost of any building that the cost per square metre is the most frequently used metric when evaluating the relative costs of various buildings...”**

Design Manual for Housing

### 6.8.3 Considerations

- The Design Manual for Quality Housing provide the minimum space standards for houses from the Quality Housing for Sustainable Communities (QHfSC) guidance. Meeting these minimum room size requirements will make the units liveable, however, anything other than a small increase on these area guides will have a negative impact on the scheme's cost viability and render schemes unviable to deliver.
- Most Traveller-specific group housing schemes will be low-density, detached, or semi-detached, and built over one or two storeys. Although often necessary to achieve a culturally appropriate response, these characteristics will result in higher costs, as discussed in Section 5.6.
- It will be important that designers and residents together find a successful balance between cost and a design proposal that will enhance the lives of the residents and be responsive to their culture.
- On halting sites, a day room is sometimes proposed. These rooms can provide a very useful social space outside of the mobile home as well as bathroom and utility room functions, and the unit should be large enough to accommodate this use.

### 6.8.4 Recommendations

- The floor area guidance and minimum room sizes in the QHfSC and planning guidelines should be met, including storage requirements.
- In the context of day units on halting sites, where an open plan living/kitchen space is to be provided, it should, at a minimum, offer a similar quantum of space identified in the QHfSC and local authority development plan for aggregate kitchen & living spaces. The day unit should also be supported by an accessible WC/shower/bathroom and a utility room. The overall area of the day unit should, generally, be up to 40 sqm. depending on anticipated occupancy.
- Floor areas for community buildings should be proportionate to their proposed use, and to the community that they will serve.
- Refer to the recommendations in section 6.6, curtilage, for guidance on sheds.

## 6.9 Living spaces

### 6.9.1 Principle

**“I like to see all around me, don’t box me in.”**

(Traveller view)

### 6.9.2 Considerations

- Traveller culture has strong association with life outdoors, and living spaces that allow views and physical connections to outdoor environments and spaces can support this tradition.
- The living space is a social space. Often there is a preference for an open living, kitchen, and dining space which can accommodate more people together and give a greater sense of space than cellular rooms.
- Views of outside spaces are important, and windows in adjacent or opposite walls will give a feeling of openness and air, as well as good passive observation of the surrounding site.
- Large windows, sliding doors, and windows that extend to the ground can emphasise connection to the outside.



### 6.9.3 Recommendations

- Living spaces should be bright, well lit, and have a good connection to the principal outdoor space. Consider open plan kitchen and living arrangements where a preference for this is expressed.
- As far as possible, the living space should be dual aspect and have good visibility of the surrounding area.

## 6.10 Sleeping spaces

### 6.10.1 Principle

- Sleeping spaces should have a good visual connection to the outside and have good quality daylight.

### 6.10.2 Considerations

- Where bedrooms are provided in an upper storey, consider including one bedroom at ground level, or a room that can be used as a bedroom at a later stage. This will give occupants flexibility in the unit, whether for ageing in place or other adaptation.
- A bathroom at ground floor will be a requirement of TGD M, however, it may be appropriate to consider inclusion of an accessible shower also to serve the downstairs bedroom.
- Where halting bays are proposed and sleeping in mobile homes is preferred, consider how sanitary and toilet facilities are to be provided. Will the mobile home be fitted with a toilet and shower and, if not, is there infrastructure provided at the bay for the future where a replacement mobile home does have a bathroom.

### 6.10.3 Recommendations

- In group housing units, ensure that at least one ground floor room is, or can be used as a bedroom. This room should be adjacent to the entrance level WC.
- Consider principles of adaptability, future proofing, and ageing in place.

## 6.11 Heating/services

### 6.11.1 References:

- Building Regulations, Technical Guidance Document L (TGD L) – Conservation of Fuel & Energy – 2022
- *Employer's Requirements by DHLGH (2020)*
- Heat Pumps - Technology Guide, SEAI – 2022
- *The Dwelling Energy Assessment Procedure (DEAP)*, SEAI – updated 2022

### 6.11.2 Principle

- Building services should be easy to maintain, sustainable, energy efficient, and durable.

### 6.11.3 Considerations

- Warm houses, built to current building regulations will assist greatly in combating energy poverty. Modern space heating systems are extremely energy efficient when correctly specified and maintained.
- Use of renewable energy will be a requirement under TGD L, and this will also be a great assistance in reducing energy poverty.
- Underfloor heating in an appropriate depth of screed omits the need for radiators and is widely considered the best heating distribution system for a low-temperature heating system such as air-to-water heat pumps. Where radiators are used with low temperature systems, they will need to be appropriately sized and maintained.

- Open fires, although traditional, are extremely inefficient and require the construction of a class 1 chimney, adding cost to the build while reducing the energy efficiency of the unit.
- Consider the location of the Cold Water Storage Tank relative to the Local Authority or Approved Housing Body's maintenance plans.
- Consider with the local authority and utility suppliers how metering should be designed. Banked metres easily accessed from site entrances can sometimes be preferred.

#### **6.11.4 Recommendations**

- A building regulations compliant space heating system should be designed, appropriate to the unit it will serve, making use of renewable energy as required by TGD L. A Dwelling Energy Assessment Procedure (DEAP) should be prepared for each unit, including day units where these are being provided.
- Open fires should, generally, not be specified as they are very inefficient, require a class 1 chimney to be constructed, and reduce the energy efficiency of the home, making it colder and harder to heat.
- A clear verbal explanation and demonstration of the operation of any equipment should be given to the residents on commissioning/handover as well as a user's manual as would generally be provided.
- Agree metering proposals with utility providers.

### **6.12 Halting Bays**

#### **6.12.1 References**

- The National Directorate for Fire and Emergency Management Guide to Fire Safety in Existing Traveller Accommodation (2019)
- BS 3632:2023 – Residential Park Homes.
- Design Manual for Urban Roads and Streets (DMURS), 2013

### 6.12.2 Principle

- Provision and siting of mobile homes on a site should provide the residents with safe, sanitary, and comfortable living conditions.
- Halting bays should be provided with appropriate support spaces and facilities.

### 6.12.3 Considerations

- Where halting bays are to form part of the development, consider and discuss with residents what supporting accommodation will be needed.
- From a local authority perspective, some of the learning that has emerged over recent years is that Travellers can require a larger halting bay structure (a day unit). This would include a kitchen, toilet/shower, utility space, and reasonably sized living room space.
- Consideration should be given to including bedroom space in the day unit for an older or disabled person or to accommodate a person suffering from illness or other medical issues.
- Where provided, consider how a day unit might be extended in the future. Consider if there is space for this to be accommodated on the site.





**Figure 6:** Day unit study, indicating where required fire safety offset distance is utilised to allow future expansion of the day house to provide sleeping accommodation.

- Placing of a day unit and a halting bay on site will need to conform to the requirements of the National Directorate for Fire and Emergency Management Guide. This will create spaces in between the mobile home and day unit/supporting accommodation. Consider how these spaces are overlooked and activated. What potential for shelter and social space is there in these areas?
- Consider how high separating walls might be placed on the site without severing visual connection to public amenity spaces.
- Mobile homes are not permanent dwellings and will, periodically, need to be replaced. Discuss with residents what future requirements the pitches might need to accommodate. In some cases, for example, double-width modular units are used to replace mobile homes. Can the proposed bay accommodate this kind of future change?

#### 6.12.4 Recommendations

- Good access and wide gateways to bays should be provided for vehicles and to allow access to periodically replace mobile homes.



- BS 3236:2023 is the current normative standard for mobile homes designed for year-round occupation. This standard stipulates that, at a minimum, a mobile home shall be fitted with a flushing WC, a bath or shower, a fixed sink, water heating system, means of connecting a mains water supply to the kitchen and the water heating system, a hot and cold-water supply, and a stop cock for the incoming water supply<sup>27</sup>.
- Sanitary, wastewater, electrical and water connections should be provided to each halting bay.
- Sanitary fittings and facilities in day units should be of a residential type, and not institutional or commercial in both scale and feel.
- In day units, where an open plan living/kitchen space is provided, it should, at a minimum, offer a similar quantum of space identified in the DMfQH and Local Authority Development Plan for aggregate kitchen & living spaces. The day unit should also be supported by an accessible WC/shower/bathroom and a utility room. The overall area of the day unit should, generally, be up to 40 sqm

## 6.13 Architectural language

### 6.13.1 References

- *Employer's Requirements, DHLGH (2020)*
- *Quality Housing for Sustainable Communities (QHFSC), 2007*
- *Public Procurement Guidelines for Goods & Services, 2019*

S.I. 284/2016 - European Union (Award of Public Authority Contracts) Regulations 2016.13.2 Principle

**“The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage”.**

(QHFSC – Quality Housing – Essential Requirements)

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<sup>27</sup> BS 3632:2015 – Section 7

### 6.13.3 Considerations

- Architectural features that may reflect cultural cues from the Traveller tradition could form part of a discussion with residents, should this be felt to be appropriate. Overhanging eaves, size and shape of windows, doors, and so on will affect the overall appearance of a house or building. It will be important to respect the feedback from community engagement, however, as not all Travellers will want their house to look different from the typical housing stock.
- What external materials might be appropriate in the context of the site and adjoining developments, bearing in mind the requirements of durability and longevity in QHfSC and the Design Manual for Quality Housing?
- Might shutters be appropriate if the household expects to be away from their home for longer periods of time?
- How does the building meet the ground? Is there an opportunity to reflect any traditional or cultural resonances in the treatment of materials and the expression of the building?
- Within the framework of the QHfSC and design manual for housing, consider opportunities that exist to derive an architectural language from cultural cues.
- Review internal fixtures and finishes and, within the framework of the public procurement guidelines and EU procurement directives<sup>28</sup>, explore if these can be specified or detailed in a way that enhances elements of Traveller culture.

### 6.13.4 Recommendations

- Architectural features should form part of continuing community engagement as outlined in Chapter 8, and architects should communicate concepts and precedents visually.
- Where typical or standard detailing is requested, this should be respected.

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<sup>28</sup> Directive 2014/24/EU, 2014

## 6.14 Landscape

### 6.14.1 Principle

**“Our landscape reflects and embodies our cultural values and our shared natural heritage and contributes to the well-being of our society, environment, and economy. We have an obligation to ourselves and to future generations to promote its sustainable protection, management, and planning.”**

(National Landscape Strategy for Ireland 2015 – 2025, Department of Arts, Heritage and the Gaeltacht)

### 6.14.2 Considerations

- Biodiversity and landscape policies will form part of all local authority development plans. Protection and mitigation of harm to these habitats will form part of the local authority planning requirements which, with appropriate support planting proposals, will greatly enhance the development.
- Discuss existing landscape character during community engagement and what habitats and ecology might exist on the site. Review if this can be enhanced by the proposed designs. Refer to Chapter 4 of the Sustainable and Compact Settlements Guidelines, 2024.
- Review landscape proposals in the context of habitat loss and native planting. Can care of planting in common areas engender a pride in the development?

### 6.14.3 Recommendations

- Consideration could be given to appointing a suitably qualified landscape architect as part of the design team for Traveller specific developments.
- An integrated Sustainable Urban Drainage Scheme (SUDS) and Landscape proposal should be prepared and reviewed with the prospective residents prior to submission for statutory approval.

## **7. Proposed Guidance on Location of Traveller Specific Accommodation**

### **7.1 National Planning Framework**

- The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040 and is aligned to the National Development Plan. National Policy Objective 28 is clear in requiring local authorities to plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, including members of the Traveller community, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

### **7.2 Housing for All**

- Housing for All proposes that the Government prioritises the availability of Traveller-specific accommodation and make improvements in the quality and quantity of such accommodation, working with local authorities and AHBs where necessary. The implementation of recommendations contained within the Traveller Accommodation Expert Group Report of July 2019 is identified as a key measure to improve the effectiveness of the arrangements for providing accommodation for members of the Traveller community.
- Specifically, Housing for All section 2.4.3 ('Support Traveller Accommodation') sets out that in accordance with the Housing (Traveller Accommodation) Act 1998, local authorities have statutory responsibility for the assessment of the accommodation needs of Travellers and the preparation, adoption, and implementation of multiannual Traveller Accommodation Programmes (TAPs) in their areas.

### 7.3 Traveller Accommodation Plans/Development Plans/ Housing Strategy

- Acquisition of sites for social housing can often be challenging and the difficulties involved (zoning, availability, political acceptance, sustainability etc.) is acknowledged.
  - It is crucial, therefore, to carefully consider the provision of Traveller sites in a strategic manner. Formulation of Traveller Accommodation Programme/Development Plan/Housing Strategy/other policies/plans should be informed by an accurate assessment of current and future accommodation needs of Travellers. Local authorities are required under law to prepare and adopt five-year programmes to meet the existing and projected accommodation needs of Travellers in their areas. The type of accommodation to be provided can range from standard local authority or voluntary housing and group housing to halting sites and hybrid schemes. The local authority should identify the specific need and plan accordingly.
  - At a minimum, a careful analysis of needs and likely response objectives should be included in all these policies/plans/strategies. This should include consultation and engagement with Travellers during the above processes. Broadly, the following approach should be applied.
1. The Traveller identifier social housing needs assessments will provide some relevant data on the accommodation preferences of applicants.
  2. Consultation with members of the Traveller community and Traveller support groups including the Local Traveller Accommodation Consultative Committee (LTACC) Traveller representatives is required prior to completion of the Traveller Accommodation Programme (TAP). The TAP will identify the location and nature/type of appropriate accommodation as part of the consultation process for the TAP and the recommendations set out in the TAP will be embedded into the relevant Development Plans applicable and to the Housing Strategy for each Planning Authority.

3. Capacity to easily access local services such as education and retail, employment and health must be a factor in identifying appropriate locations for accommodation. A structured approach such as the site location tool as referred to in section 7.5 and as illustrated in the appendix to this report.
4. The Department of Housing's Development Plans guidelines (2022) includes Mandatory Objective 7.5 that requires each Development Plan to provide 'accommodation for Travellers, and the use of particular areas for that purpose.' as per Section 10(2) (i) of the Planning and Development Act 2000 (as amended).
5. To support the identification of additional locations for Traveller Specific Accommodation, zoning policies should also be drawn up by local authorities in a flexible manner to reflect the need to secure additional Traveller accommodation over the lifetime of the development plan. The Office of the Planning Regulator (OPR) have prepared a Case Study Paper 'Traveller Accommodation and the Local Authority Development Plan', 2021, to highlight best practice and support planning authorities in the development of Traveller accommodation policies and objectives in development plans.
6. Consultation and liaison with the Department and its technical advisors should also be undertaken at the site selection stage, and during early design, elaborated in Chapter 8.
7. Standard social housing accommodation developments should consider the possibility of including Traveller group housing where required. The use of Part V provision can also be considered for this purpose.

#### **7.4 Implementation Phases**

The following should be considered as general guidelines for implementation of the above policies:

- Carry out a detailed assessment of need including identification of family groupings as part of the Traveller Accommodation Programme.
- Develop a detailed implementation plan for the delivery of sites in specific locations (e.g., towns, large town/city suburbs etc.) with projected start and end dates (this may have been completed as part of the above policies).

- Identify possible sites in each area and carry out preliminary assessment of these using the above methodology but influenced by topography, soil characteristics, encourage social mix considerations, availability, zoning, etc. Liaise with possible providers (AHBs, private sector etc.) and with DHLGH as appropriate.
- Carry out an initial consultation with the families as per the Framework for Consultation and redefine/finalise priority issue grid referred to above.
- Choose a site. Appoint technical teams. Commence detailed consultation with the families, collectively and individually around need, expectations, and requirements. Liaise with DHLGH on proposed outline design and funding application.
- In parallel, commence the 4 – stage approval process, including earliest consultation with the Department’s Technical Advisors.
- Continue to liaise with families during design and construction and draw lessons to inform choice of other sites.

## 7.5 Site Location Tool

A site assessment tool may be used to assist initial site selection. A simple rating system example is included in appendix 5, and this can be used as an additional aid. Further versions of such a rating system can be developed during early consultation phases. The purpose is to assist local authorities and other accommodation providers to choose optimum locations and to avoid past mistakes. A similar model has been developed by DHLGH to optimise site selection for older persons accommodation and the learning from that process can inform a model for site choice for Traveller Accommodation.

## **8. Guidance on consultation for developing Traveller Accommodation**

### **8.1 Early Consultation – Building Relationships**

Successful schemes, where stable communities are formed and Travellers feel supported in both their accommodation needs and in their cultural identity, can often share many physical design traits with unsuccessful schemes, which Travellers then often seek to leave.<sup>29</sup> In this research, the greatest predictor of a successful scheme is a high degree of meaningful community engagement with both the design and management of the development, including allocations. The key recommendation of this report is early community engagement with the Traveller households for whom the development is intended.

This kind of meaningful engagement will greatly de-risk the project in terms of abandonment and vacancies later.

### **8.2 Emerging good practice for project engagement**

Ideally, a process of engagement would be in place before a site is identified and, in any event, prior to a stage 1 approval submission to the Department for Housing (see section 8.4 below). The process should be underpinned by a human rights-based approach ensuring that Travellers are at the centre of the decision-making process in the identification, design, and delivery of their homes. A human rights-based approach: 'is concerned with the process as well as the outcome of human rights implementation and therefore people are recognised as key actors in their own development, rather than passive recipients of commodities and services' (UNICEF 2004). Participation is both a means and a goal, strategies are empowering, both outcomes and processes are monitored and evaluated, and programmes focus on marginalised, disadvantaged, and excluded groups<sup>30</sup>

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<sup>29</sup> Why Travellers leave Traveller-specific accommodation, NTACC, 2014.

<sup>30</sup> R. Hearne & Kenna P., (2014), Using the Human Rights Based Approach to Tackle Housing Deprivation in an Irish Urban Housing Estate, Journal of Human Rights Practice Vol. 6 | Number 1 | March 2014 | pp. 1– 25, Oxford University Press.



This approach would:

- provide a framework for ongoing cooperation and decision making between the local authority and the Traveller communities/families impacted.
- have the benefit of developing and facilitating the successful management of the accommodation being provided in the long term.
- inform the work of the Local Traveller Accommodation Committees and the Local Traveller Accommodation Programmes of each local authority.

A relationship based on trust, communication, confidentiality, and respect, between Travellers and the local authority, that seeks to uphold culturally appropriate accommodation, is the aim.

The local authority in collaboration with the LTACC and Traveller organisations should organise training on Traveller culture for all personnel involved in the project. This will ensure an understanding of the impact of culture on the design process. Key personnel from the local authority should be engaged as early as possible to ensure meaningful commitment to the process. Traveller support groups should be invited where appropriate to assist Travellers in organising and representing themselves within the process and in the management of their accommodation.

### **8.3 Approaches to Community Engagement - A General How-to Guide**

Building long-term relationships is one of the key elements underpinning an inclusive community engagement process.

As part of the Open Government Partnership initiative, the Department of Public Expenditure and Reform produced a set of consultation principles and guidance in 2016 which state that meaningful participation [in policy development] increases the legitimacy of decision-making, improves the public's knowledge and awareness of complex policy challenges, helps decision-makers to make better decisions and can lead to improvements in the quality-of-service provision. These principles were also included in the subsequent Guide for Inclusive Community Engagement in Local Planning and Decision Making, published by the Department of Rural and Community Development, 2023.

This guide sets out nine principles that should inform public service processes which include the expectation that such processes should be:

- **Genuine:** A genuine process is respectful and open. This requires commitment and an understanding of the value of community engagement from those leading the process. It avoids a ‘tick-box exercise’ or a foregone conclusion.
- **Purposeful:** A purposeful process is one that matters. A process that matters is one that is connected to decision making that is informed by what the people you are engaging with said.
- **Planned:** A process should be comprehensively planned. You should use a transparent approach and make sure all stakeholders are engaged in ways that make it possible for them to take part. For example, use plain English in your communications and share the same information.
- **Clear:** You should be committed to making the purpose, scope and possible results of an engagement process clear to everyone involved. This will mean that people are engaging in an informed way.
- **Inclusive:** You should make sure the process includes everyone who is affected by the outcome of the engagement process. You may need to introduce specific interventions and arrangements to make sure you include a diversity of voices.
- **Collaborative:** You should collaborate with other stakeholders when designing the process and putting it in place. This is essential for inclusive community engagement. It enables those taking part to share power.
- **Accountable:** For the process to be accountable, you must be committed to reporting back to stakeholders on what was and was not included in the process as a result of them taking part.
- **Accessible:** To make the process accessible, you need to identify and overcome barriers to engagement.
- **Fit for purpose:** You need to make sure that the scope, approach and methodologies of an engagement process are designed to enable those engaging with the process.

The guide identifies three core phases in the consultation and engagement process that should be applied in the development of policies and programmes in the public arena. The three phases are:

- **Phase one: Planning stage:** This phase involves ensuring all stakeholders are briefed and committed to the project and have the necessary information, understanding and skills required to deliver on an agreed plan.

In the Traveller accommodation context, this will involve ensuring respect for Traveller culture by all stakeholders is in place and is central to the project, that the information pertaining to the project is discussed and understood by everyone involved, and all stakeholders are fully involved in the design of the accommodation. This also involves a commitment to addressing any barriers that may arise.

- **Phase two: Implementation:** This phase involves implementing the planned process, ensuring ongoing communication and engagement about the project with all stakeholders, applying appropriate methodologies such as workshops, location visits and feedback on the progress at key milestones.

In the Traveller accommodation context, this involves ensuring Travellers are informed about progress in the planning phase. It is important to achieve sign off by all stakeholders prior to submission for planning approval, as later changes can be expensive, and cause delay, in particular if a revised planning application becomes necessary. Time frames for each element should be provided.

Funding mechanisms, such as the percent for art scheme, might be considered for other culturally relevant features, for example a grotto, which can build community meaning and pride in the development.

- **Phase three: Review:** This is the final stage of the consultation and engagement process. This involves checking back with all those involved to establish if the process implemented its stated principles and delivered what it set out to do. The experience of all stakeholders involved should be sought and critical reflection of the process and the outcome should be examined. This learning can be used to adapt and develop processes for ongoing work in this area. In this context, ongoing liaison with the community is important to address new challenges and respond to changing needs.

## 8.4 Department Consultation/Approval Process

Mapping Community Engagement with the 4-Stage Social Housing Approval Process

Community Engagement Core Phases	Social Housing Approval Process
Phase 1 – Planning	Pre-Stage 1: Current Pre-Application Stage
	Stage 1: Capital Appraisal (CWMF PR1)
Phase 2 – Implementation	Stage 2: Pre-Planning Approval (CWMF PR 4)
	Stage 3: Pre-tender Approval (CWMF PR 6)
	Stage 4: Tender Approval (CWMF PR 7)
Phase 3 – Review	Stage 5: Handover

### Phase 1 – Planning

#### Pre-Stage 1: Current Pre-Application Stage

The Local Authority should carry out preparatory engagement with Traveller families in need of accommodation to begin to build trusting relationships. The following process does not have to be linear and should be adapted to suit local circumstances, as appropriate. The local authority should conduct outreach to the Traveller families involved and begin to explore their needs individually and collectively and identify how they would like to engage in the process. For example, the families may like to meet collectively or select a family representative to attend regular meetings. The local authority should also discuss with the families the challenges and limitations of the design in terms of resource constraints, and the timeframe for consultation and the approval process. This will ensure that the parameters of design are shared and understood.

Discussions around future need should form part of the discussion at this stage including how the proposed accommodation could provide a long-term, sustainable, scheme supporting Travellers in their identity for future generations.

Recommendation AP-1 of the Social Housing Pre-Construction Process Review<sup>31</sup> proposes that pre-application development, including site investigations and surveys, should be supported by payment of fees for this work. It is proposed that, in the case of Traveller Specific Accommodation, pre-stage 1 community engagement is also supported with a similar allowance for fees. This may be either in-house within the Local Authority in collaboration with the local Traveller project, or with the assistance of external consultants, which may include architects or other independent facilitators who, in the view of the local authority, may assist the process and development of a viable proposal with outline costings that reflect the outcome of the initial engagement.

The outcome of the initial engagement should be recorded, including any sketches or diagrams, particular cultural concerns, and ambition for the project. This should be circulated to all parties as soon as possible once the initial engagement is completed.

### **Stage 1: Capital Appraisal (CWMF PR1)**

Where it becomes apparent in preparing a Stage 1 CWMF PR1 report that culturally specific characteristics of a proposal are likely to carry abnormal expenditure affecting the base unit costs, this should be identified in the Technical Report submitted at Stage 1. These will be assessed on a case-by-case basis. This should be in addition to any site remediation or services diversion costs, which should be identified separately in the normal way.

Access for pre-Stage 1 technical surveys should be discussed in the case where it is proposed to redevelop existing Traveller sites. Locating and identifying existing underground services, for example, is a crucial step in risk-assessment of a site and its development cost.

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<sup>31</sup> Review of Pre-Construction Processes for Social Housing Construction and Mixed Tenure Projects, Working Group Report, January 2022

Informal liaison with the Department's advisors prior to a formal Stage 1 submission is encouraged.

Where it is envisaged that an external design team will be procured after a Stage 1 approval<sup>32</sup> a record of the pre-Stage 1 engagement and the agreed outcome/direction for the project should form part of the brief to design teams, including any architectural or visual diagrams.

Where a modular construction option is agreed, the outcome of the pre-Stage 1 engagement should form the basis for the Request for Tenders (RFT) to suppliers. In this option, further community engagement should be identified as part of the requirement, and the bidders' approach to engagement should form part of the quality assessment.

## **Phase 2 – Implementation**

The second phase of the engagement process is the intensive phase involving teasing out elements of the design with all stakeholders, including technical staff and the design team.

Where an external design team has been appointed, they should meet with the Traveller families or their representatives to review the outcome of the initial engagement before any design work is started. Similarly, where a modular or 3D volumetric off-site solution is agreed, the successful supplier and their designers should engage with the Traveller families and review the parameters and scope of the project within the framework of an off-site product.

A programme of work should be established, including milestones, time frames and expected outcomes. This phase involves exploring design possibilities with families and assessing their needs individually and collectively to feed into the overall design. The local authority/design team should present design options to the Traveller families and adapt as appropriate leading to agreement with the families on the design. To assist in this process and inform design ideas, the local authority, Travellers, and Traveller organisations may review or visit Traveller

accommodation to view good practice designs in other local authority areas. Information arising from this process should be fed into the LTACC.

### **Stage 2: Pre-Planning Approval (CWMF PR4)**

The Stage 2 submission, and the technical report comprising the Project Review 4 (PR4) is a critical approval. The number of units or bays, access arrangements, and the principal design features will need to be agreed and signed off, as well as any significant site features and other factors affecting the overall site development cost. Material changes proposed after this approval may require reassessment at department level and will likely delay the overall delivery of the scheme.

Therefore, engagement at this stage should be structured and recorded. Agendas and arrangements for meetings or presentations should be discussed with stakeholders in advance. Good communication material should be made available. This may take the form of architectural presentations, 3D models or sketches, and so on. Material should be distributed in good time following any meetings or presentations. Decisions and agreements should be recorded and circulated.

Section 6 of these proposed guidelines includes themes and topics that may assist in developing culturally responsive design proposals and identify the relevant statutory and guidance documents already in force. Meetings with the design team including the architects will be essential. The engagement should be iterative, and feedback from the Traveller families involved should be reflected in the design. It will be important during this stage to ensure that cost benefit forms part of the discussions.

Stage 2 approval gives sanction for a budget and a design which will then have to pass through various statutory permissions, checks, and controls. This process of statutory consent can be lengthy, and the timescales should be explained to all stakeholders. The Traveller families or their representatives should be kept apprised of any changes that occur to the design or layouts as a result of conditions or requirements of these permissions, for example fire certificates or planning conditions or part 8 recommendations.

### **Stage 3: Detailed Design and Pre-tender Cost Estimate (CWMF PR6)**

Prior to submission of a Stage 3, PR6 approval submission, a detailed pre-tender cost estimate must be prepared based on a detailed technical design and specification prepared by the design team. Preparation of this design is a largely technical exercise, coordinating inputs from structure, building services, safety, and other consultants.

Where deemed necessary by the Local Authority, a meeting may be arranged with the Traveller families or their representatives to review any unexpected cost implications of specific design features and assess cost benefit prior to submission of this Stage 3 report.

### **Stage 4: tender Approval (CWMF PR7)**

Once approval to appoint a contractor is in place, a letter of acceptance can be issued, and the contractor will take possession of the site. During construction, safety on site becomes the responsibility of the contractor. Access onto the site will not be possible for stakeholders, although a site visit may be arranged at the contractor's discretion and facilitated through the Local Authority.

Updates and reports on progress may be issued by the Local Authority either formally or informally, maintaining engagement with the Traveller families.

On handover, the design team and local authority should arrange an on-site demonstration for the residents, of the building services, including any space heating technologies, thermostats, etcetera.



## **Phase 3 – Review**

### **Stage 5: Handover**

A feedback review would be hugely beneficial to the Local Authority and to the Traveller representative bodies to understand how effective the process of engagement was and how the outcome is perceived. This should, ideally, be carried out within 11 months of the date of substantial completion of the building contract, where this is possible.

The format for the feedback review may be in the form of a survey or a simple feedback engagement meeting and the 'lessons learned' recorded and used to inform subsequent engagement processes. The results of the feedback review should be shared with the LTACC.

The relationships built during the design delivery and engagement phases should form the basis for tenant participation committees, where residents would take responsibility for the management of the site, reducing or eliminating the need for caretakers on site.

## Summary Guide

Community Engagement Core Phases		Social Housing Approval Process
<b>Phase 1 – Planning</b>	<p>Preparatory engagement with Traveller families. Agree how engagement will happen and who will be involved.</p> <p>Agree the outline extent of the proposal including the number of families to be accommodated.</p> <p>Discuss the approval process and timeframe for delivery of the project.</p> <p>Ensure appropriate expertise is available incl. architects and/or facilitators as deemed appropriate by the Local Authority</p> <p>Record the outcomes, including concept sketches or diagrams, and circulate.</p>	Pre-Stage 1: Current Pre-Application Stage
	<p>PR1 Technical Report should record community engagement and record outcomes/approach/agreements. Identify any potential costs associated with culturally specific characteristics of the proposed development.</p>	Stage 1: Capital Appraisal (CWMF PR1)
<b>Phase 2 – Implementation</b>	<p>The outcome of the initial engagement should form part of the brief to design teams/suppliers.</p> <p>Design Team should meet with the Traveller families and/or their representatives as agreed in phase 1, before any design work is started. Review the outcome of initial engagement and develop through an iterative process.</p> <p>Agree timeframe for design development and feedback.</p> <p>Intensive phase involving teasing out elements of the design with all stakeholders. The engagement should be iterative, and feedback from the Traveller families involved should be reflected in the design.</p> <p>The Stage 2 PR4 Technical Report is a critical gateway and material changes proposed after this approval are likely to delay the overall delivery of the scheme. Clear sign off and support for the proposal from all stakeholders on submission of this Stage 2 report is crucial.</p>	Stage 2: Pre-Planning Approval (CWMF PR 4)

Community Engagement Core Phases		Social Housing Approval Process
<b>Phase 2 – Implementation</b>	<p>Technical stage developing detailed design and ensuring compliance with Building Regulation and Procurement Legislation.</p> <p>A detailed pre-tender cost estimate must be submitted as part of the PR6 Technical Report.</p> <p>Where deemed necessary by the Local Authority, review any unexpected cost implications of specific design features with the Traveller families to assess cost benefit prior to submission of this Stage 3 report.</p>	Stage 3: Pre-tender Approval (CWMF PR 6)
	<p>Approval to appoint a contractor.</p> <p>During construction, safety on site becomes the responsibility of the contractor. Access onto the site will not be possible for stakeholders, although a site visit may be arranged at the contractor’s discretion and facilitated through the Local Authority.</p> <p>Updates and reports on progress may be issued by the Local Authority either formally or informally to maintain engagement with the Traveller families.</p> <p>Ensure demonstration of building services on handover.</p>	Stage 4: Tender Approval (CWMF PR 7)
<b>Phase 3 – Review</b>	Carry out a feedback review with the tenants, ideally within 11 months of the building contract completion date. Record ‘lessons learned’ and share with LTACC.	Stage 5: Handover

## 9. Appendices

### 9.1 Appendix 1: Details for consideration in design as highlighted in the field studies and stakeholder engagement

#### 9.1.1 Summary from 6 representative constituencies (Travellers, Local Authorities, Agencies, Traveller Advocacy Groups)

##### a. Consultation<sup>33</sup>

All those engaged in this review process indicated that intensive consultation over the lifespan of each proposed project is required and is an essential feature of managing project delivery and subsequent maintenance. Such consultation can only be undertaken by staff if the people concerned are fully skilled in community engagement techniques and underpinned by cultural awareness. An independent facilitator/mediator can often be effective however this will add to costs for local authorities. Relevant staff training on cultural understanding was, consequently, also highlighted throughout the engagement and field studies as essential. Many of those engaged confirmed that such skills and awareness had been lacking or had been tokenistic in most cases in the past. Establishment of shared values of those doing the design and those who ultimately should benefit from that design should begin at an early (and preliminary) stage in the four step approval process.

It was also suggested across many contributors that it is important to establish real preferences of the target communities. This would likely require a bespoke approach to engagement given the diversity of such communities. A universal approach is seen as unlikely to provide the necessary capacity to understand the needs of such communities.

A key underpinning characteristic of such engagement is about establishing a long-term relationship with the relevant community or family and empowering a proactive response between those charged with planning and design and those that would ultimately benefit from active engagement.

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<sup>33</sup> All of the material in 9.1 Appendix 1 was stated in consultations.

Standard housing is often seen as the option most likely to be delivered upon and hence is often suggested as the highest preference in needs assessment. It was also noted across the engagement process that increasingly many Travellers, whose lives have been lived away from the halting style/nomadic practices, will focus on comfort. This thinking needs to be more fully explored as there is a dearth of good group housing options available to Travellers and, hence, many may choose standard housing as the most feasible option available to them.

It is also important to note, as suggested throughout the engagement and field studies undertaken for this report, that long delays with the 4 stage and Part 8 processes are seen as unhelpful to consultation and ultimately to actual delivery of projects.

## **b. Location**

Early constant consultation and good communication which is bespoke to the relevant target community or family is the key to needs assessment and location identification. Progress in the delivery of culturally appropriate accommodation options does depend on early consultation. It is evident that at the very least many wish to be near facilities. Therefore, there is a need to assess, in a structured manner, which facilities are important to the particular community or family.

Traveller Accommodation can be included in larger housing schemes which could then facilitate integration and maintenance of identity. Travellers often state that they wish to identify as a Traveller and maintain culture in standard housing situations. Others suggested that there are members of the Traveller Community who just want to live separately from other Travellers.

There are enhanced challenges in finding sites in urban areas. A growing increase in new accommodation provision needed to catch up on non-delivery as well as the use of unsuitable legacy sites. Political acceptability is a challenge as councillors often block schemes at a late stage in the development process, sometimes including those that have been developed to almost full design. City sites are particularly hard to find and need innovative solutions worked out through dialogue.

A common perspective from the engagement process for this report is that the over-concentration of Travellers in one area should preferably be avoided. Political and community opposition may arise if accommodation provision is overly concentrated in specific locations. Location preferences are not much different to anyone else in society.

Specific zoning in a development plan and the insertion of good objectives may not be feasible and therefore the naming of specific sites in development plans may require legislative change.

Comfort and room size are important to some. The use of existing Traveller community centres as hubs for Travellers and/or the settled community in the proposed area for development could be given consideration.

### **c. Design**

Always confirm everything within a detailed consultation process was suggested time and again during the engagement process for this report. Equally it was suggested that potential sites should be kept limited to a maximum of 6-8 home units. This means that there is a need to develop new thinking on accommodation levels in built up areas, because of a lack of space availability. The incorporation of sustainability in design is increasingly a requirement while social, economic, and cultural aspects should also be included.

Some specific aspects were highlighted through the engagement process for this report. This included the suggestion that sheds be included from the beginning of the design process without need for ongoing negotiation between central and local government.

Also noted that many halting sites are cold and outdated. There is a need for local discretion to improve this position and it should not require an extensive approval process to correct. In addition, it was suggested that cultural elements cost little if embedded into design from the earliest possible time. The use of design consultants and their direct interface with target communities does occur infrequently so project design is often contingent on local authority staff understanding the complexities of the sites/locations they are dealing with and this is not often the case.

Allowing for future expansion (10% to 20%), where space permits, as families move through their respective life cycles is important and likely in the longer term to be more cost effective. The need for room for future expansion to avoid future overcrowding should therefore be included in the design process. This may include the allowing of underutilised space in yards initially. So, design needs to have a clear regard to life cycle and so provide design support to families wishing to improve their units over the family life span. Allowing play space/green spaces on sites is important as is ease of access to person centred services. Other factors suggested include meeting the need for large open rooms – kitchen, living, utility, can be designed to prevent over use of a site. Stables are not necessarily needed but room for a horse box might be adequate if land could be made available elsewhere.

#### **d. General Issues**

Frequent changes of staff at national and local government levels was highlighted as an issue. Relationships between councils and Traveller support groups are important for success. National authorities need to learn from local models of good practice and reward excellence. Reform of NTACC was highlighted as urgently needed. It is seen as currently toothless. Need for application of discretion locally was put forward for consideration.

Local support groups might not always fully reflect local Traveller needs or expectations and therefore a comprehensive consultative approach is required as noted above. Training and capacity building may also be needed locally for both council and retained consultants working with Traveller Communities and Families.

A lot of LTACCs work reasonably well but need training. The LTACCs need to be a driver of equality and application of public sector duty at local level. If strengthening national structures, the Department needs to make sure to focus on local enhancement also.

The CENA model is good but under-resourced.

A rich culture needs to be preserved in modern Ireland. All Value For Money calculations should take account of the cost of doing nothing or of poor design.

## 9.1.2. Results summary from other stakeholders

### a. Consultation

Sites developed without consultation and having a mix of families often result in long-term challenges. The need to have structured communication over a long period from pre-design to ultimate site maintenance was highlighted. The knowledge of consultation fatigue was highlighted.

Development of the LTACC as a catalyst for developments and including representatives from potential developments as members of LTACC was suggested.

Need early allocation for Travellers to allow consultation to begin early.

Finally, independent agreed facilitation was suggested as needed and such efforts require consistent and long-term financing from central government as many Local Authorities cannot afford to resource this.

### b. Design

Each family will have different cultural needs. Culture should, therefore, be central to design. Spacious, good access and space between bays, wide entry road onto the site and in the site could be regarded as minimum expectations from the Traveller Community. Other considerations put forward included: Communal spaces for planting, Being able to work in one's own shed or very close by helps economically and mentally and contributes to the circular economy.

Halting site day units should be designed to have one bedroom for older people or people who are ill. Such units should also include room for future growth and/or for family members on the road.

Council staff and consultants need to outline options to consultees– getting certain facilities may mean loss of others (2-storey houses allow larger yards in semi built up areas). “flexibility within boundaries” approach.

The 4 stage process gives council staff certainty but includes the target families/communities in regular DHLGH/LA design meetings rather than separately. Need to cater for genetic and medical issues at design stage. In addition, there may be a need for all agencies (education, garda, etc.) to be included on a design



team. Need fair dialogue but limit excessive demands. On rare occasions one can provide the open space at the front of the unit.

Some discretion in picking internal fittings has to be included. This means having the design engineer or architect at all meetings with target families/communities – Such staff need to understand community development. Mobile homes on halting sites work for some families – others want caravans. Outside space is very important for Travellers. These factors, it was argued by several contributors, need to be considered in any design guidance issued by the Department of Housing, Local Government and Heritage.

Councils should control barriers on halting sites and balance children's needs and vehicular movements. Funding for non-construction elements including facilities needed. Design out dumping while allowing for Fire Officer requirements often results in high walls, so make every effort to have an open aspect to sites.

Providing space nearby for caravan parking when designing for very built up areas. Younger Travellers generally want modern facilities. Need for clear guidelines on what is expected and allowed by DHLGH.

Light is important inside accommodation and never use boulders which are symbolic of oppression.

### **c. Location**

Increasingly government policy and guidance should seek to include Traveller Accommodation in all social housing developments and near facilities. Part 8 objections are pushing councils to adapt halting sites into group housing rather than new developments. Taking away Part 8 will weaken the role of councillors but this may not be a satisfactory approach to accommodation development.

It was strongly suggested that a needs study/consultation before a TAP is adopted should be completed and fed into the Planning Authority's Development Planning. Each local authority needs to identify new halting site locations in light of growing population. Transient sites may be needed around the country.

Also, as urban sprawl reaches isolated Traveller Accommodation sites there is a need to reserve adjacent zoned land nearby for Traveller Accommodation – this allows space for inclusive Traveller culture. The need for close alignment of the Development Plan, Housing Strategy and TAP was also emphasised.

#### d. General

Doing it right the first time saves money and shows respect for Travellers. With serious disputes one can get a court appointed mediator. Where Travellers have the means and have improved their sites one should consider sale to the families. Strict cost limits are hindering Housing Association activity. In some cases, one family can tend to dominate each site resulting in empty bays – smaller developments may therefore be the better response to such circumstances.

Some existing sites are good, some are bad, some were good that became bad. Ongoing tenant participation is needed. A response to this may be residents committees and the promotion of enterprise on sites. Currently there is overcrowding resulting from lack of build.

Local Authority Chief Executives need to use executive powers when conditions deteriorate badly. A good caretaker along with unprejudiced LA staff is important. In addition, significantly more resourcing needed for local TAUs and this will allow progress on Traveller Accommodation. The LTACC is a key hub for bringing issues to other policy platforms of the Council and Department including renewal of policies such as, regeneration policy, future land acquisition planning, the Development Plan (associated Housing Strategy) and the Local Economic and Community Plan among others. Housing assessments should offer all options and allow a number of preferences to Travellers.

Traveller Interagency Groups are essential to help create healthy, safe, and happy accommodation. Use life-cycle assessment when assessing financial limits/VFM. The very rich Traveller folklore needs to be collected including from Travellers in standard housing.

The Housing Agency 2008 reports should be used as a basis for establishing up to date and relevant data banks.

Need to resource local Traveller support groups to engage in accommodation/consultation processes.

Government should consider social enterprise grant schemes for Travellers.

Travellers denied the right to practise culture by not being allowed to move as in previous generations. Hence, the state

needs to take positive action to encourage this nomadism – this will have economic, health, social and environmental benefits. Need a strong national body to ensure delivery happens at the local level.

## 9.2 Appendix 2: Field Studies

### 9.2.1 Field study 1

#### Accommodation Details:

- **Type:** Group Housing
- **No of families:** Ten families all related and three families doubling up
- **Year of build:** (First phase developed 10 years ago (5 houses) second phase completed three years ago (5 houses)
- **Designed by who** (local authority or social housing body): Local authority
- **Location:** Near facilities/or isolated, any other comments: Yes, near transport and schools

#### Design:

- **Special features re layout:** Spacious two-story houses with large yards, wheelchair accessible
- **What do the facilities include:** High spec, insulated, 4 bedrooms and shower room downstairs also
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** No provision for cultural spaces, surrounding area neglected and poor fencing around each house subject to wind damage. There is an opportunity to erect a grotto and engage the community in managing the outdoor area.
- **Is it easy to maintain, is it easy to heat, can it adapt to changing needs (future proofing)?** Yes, easy to heat but maintenance problems persist regarding water pressure and access to running hot water.
- **Other positive or negative design features?**

## Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** Yes, facilitated independently and conducted over 6 months with twice weekly meetings building trust, agreeing on design, and responding to issues as they emerged.
- **If so, what were the key elements that made this a successful process?** Liaison of the local Traveller support group who facilitated the process between the families and the council. This worked well as it enabled good follow up and progression between meetings building trust with all the stakeholders and creating a willingness to work through issues as they arose. The provision of clear and up to date information on the development responding to needs, and ongoing reassurance to families that the accommodation would be built were also highlighted as key elements that contributed to its success.
- **What were the elements that could have been improved?** More resources to the local Traveller support group were needed to carry out the work as the support group had no extra resources to carry out this work. Response to maintenance and management issues need to be improved. In terms of the overall environment, poor fencing and landscaping is leading to the surrounding areas looking unkempt. There is space but no play area for the children, no stables for horses. It was identified by Travellers that one of the problems is that key staff don't have experience of working with Travellers or training to work cross-culturally.
- **In cases of poor accommodation: What were the factors adding to the above that led to the accommodation being unsuccessful?** N/A
- **What should have been put in place to achieve better outcomes?** Resources such as funding for an accommodation worker, and cultural aspects of the project should have been addressed, the maintenance and overall environment should have been developed before sign off, and training for council staff to work cross culturally

## Management:

- **What are the key factors that led to successful/unsuccessful management of Traveller accommodation in the long term?**
  - **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** Provision for culturally appropriate spaces, encouraging strong Traveller involvement in the longer-term management, responding to maintenance issues quickly, ensuring the surrounding areas of the development are finished to enhance the living environment.
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### 9.2.2 Field Study 2

#### Accommodation Details:

- **Type:** 11 houses and 14 bays
- **No of families:** 25 families
- **Year of build:** 30 years ago
- **Designed by who (local authority or social housing body):** Local authority in consultation with families and an architect
- **Location:** Near facilities/or isolated, any other comments: near the local community, recent developments have sprung up around it.

#### Design:

- **Special features re-layout:** Separate entrances to the site and the group housing in a circular layout. The group housing is built around a chapel and each house looks onto a green area. There is a well-used community centre at the entrance to the group housing which runs a range of programmes for children.
- **What do the facilities include:** The houses are insulated now with a living area, a separate kitchen area, two bedrooms and a toilet and bathroom. The yards out back are spacious and have room for sheds. There is poor storage in the houses and the day units. Some improvements are now needed.

- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** Yes, the site provided a community centre that is very active, there is a paddock beside the site for horse activity which links to a local horse project, and there is ample space for parking extra vehicles and caravans.
- **Other positive or negative design features?** The accommodation is very well maintained. A caretaker maintains the green areas and individual plots are very well kept. The families have input into who is allocated a bay or a house which helps to maintain a balance on the site. They don't have a veto, but the local authority does consult with the families on allocation. The site is in a circular shape/ horseshoe which is positive and facilitates looking out onto the community and the green area. Touring caravans are allowed on the site and there is space for them.

#### **Consultation:**

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** Yes, it was the first of its kind. Plans and a model were drawn up with an architect and the support of the local Traveller support group. All families in the original camp were included. The process took place over a year and the design was agreed with the council and families. Regular meetings, clear information, and parameters on what could be provided were set early on and the families worked closely with an architect to understand the cultural aspect of the design. Very positive process leading to a sustainable outcome.
- **What were the elements that could have been improved?**  
N/A
- **In cases of poor accommodation: What were the factors adding to the above that led to the accommodation being unsuccessful? What should have been put in place to achieve better outcomes?**

## Management:

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term:**
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** The site maintenance is prompt and the families have an input into who should be allocated a vacant bay/house. The families don't have a veto. But consultation does ensure that harmony is upheld on the site. The families have a good relationship with the caretaker and the spaces around the suite are very well maintained.

## Any other comments:

- Compatibility is important. Elders and long-term residents are consulted regarding allocation.
- 

### 9.2.3 Field Study 3

#### Accommodation Details:

- **Type:** 10 houses and 10 bays
- **No of families:** 15 families
- **Year of build:** 2006
- **Designed by who (local authority or social housing body):** The local authority and is a proposed refurbishment as it is in need of upgrading.
- **Location: Near facilities/or isolated, any other comments:** Isolated, but new housing development is being built around it which will bring services.

## Design:

- **Special features re-layout:** You can drive around the site and there is a community facility. The yards are big which is positive.
- **What do the facilities include:** In general, the facilities are poor as the houses and day units are in need of upgrading and repair. One family had put in place a western-style house from their own resources. Another family had put down decking and constructed sheds to help with the lack of storage from their own resources.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** There is a community building on site which is used for children's activities. The local authority are proposing to get rid of this and 1 bay and 1 housing in the proposed redevelopment.
- **Other positive or negative design features?** The site is very poorly serviced, the units are in need of upgrading. The roofs are tin and the windows are at a low level. There was evidence of green mould due to poor drainage and no insulation.

## Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** No
- **What were the elements that could have been improved?** A consultation process inclusive of all stakeholders on the location, design and delivery of the accommodation would have led to a more sustainable outcome.
- **In cases of poor accommodation: What were the factors adding to the above that led to the accommodation being unsuccessful?** Lack of consultation.
- **What should have been put in place to achieve better outcomes?** A consultation process has been put in place for the redevelopment of the site. The families have met the local authority over 20 times to discuss the design but no plan has been agreed. In recent meetings the Traveller support group got involved and started to record the decisions and this has enabled proper follow up to be conducted with the local authority on decisions made at meetings. The key problem is despite the number of meetings the families haven't met the architect so the plans being produced are unsatisfactory.



## Management:

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term:**
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** At the early stages of the consultation process, the architect should be involved and plans designed in response to the family's needs upholding cultural traditions. Families should be shown a mock-up plan and key decisions about the design should be made with the families. If this is done early and sign off achieved this would avoid unnecessary conflict and frustration.

## Any other comments:

- **The key personnel need to be involved in the project who are:**
    - Families impacted
    - Senior decision makers from the local authority who can draw on relevant departments/personnel within the council (planning, architect, community, Traveller accommodation unit, Manager)
    - Architect
    - Local Traveller support group
- 

### 9.2.4 Field Study 4

#### Accommodation Details:

- **Type:** 5 houses and 5 bays
- **No of families:** 2 families
- **Year of build:** 2013
- **Designed by who (local authority or social housing body):**  
Local authority
- **Location: Near facilities/or isolated, any other comments:**  
Rural, not near transport networks

## Design:

- **Special features re-layout:** Generous space, community centre but as the facilities are poor most people have moved away.
- **What do the facilities include:** Very poor huts with minimum facilities but large sized bays. Very poor houses with chronic dampness, no insulation, no back window, the windows are very low so they can't be opened and no view from them, no back door, only one route into the house, serious fire hazard
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** There was a community centre but this is no longer in use. There is no provision for horses which is the mainstay of the family there.
- **Other positive or negative design features?** The space on the site is good and there is a community centre but due to poor facilities and poor maintenance, the centre has not been utilised and maintained.

## Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** Yes, the families met the local authority and the architect and a design was agreed. However, the agreed design was not delivered leading to a breach of trust and poor relationships between the family and the local authority.
- **What were the elements that could have been improved?** The agreed design should have been delivered.
- **In cases of poor accommodation: What were the factors adding to the above that led to the accommodation being unsuccessful?** Breach of trust. Lack of delivery of the agreed plan. Poor response to cultural needs.

- **What should have been put in place to achieve better outcomes?** Trust, delivery of the agreed plan, and response to cultural needs. Working with the family in a genuine consultation process leading to clear outcomes for upgrading the site.

#### **Management:**

- **What are the key factors that led to successful/unsuccessful management of Traveller accommodation in the long term?** There is a caretaker who comes to the site but the role is minimal. Overall maintenance is poor with the community centre disused. An elderly couple live on site with poor mobility and there is no provision for this.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** Listen to Travellers and act on their needs in a genuine consultation process.

#### **Any other comments:**

- Small sites work best.
- Wheelchair access is important.
- Uphold the cultural traditions of Travellers and this will ensure better management of accommodation in the longer term.

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### **9.2.5 Field Study 5**

#### **Accommodation Details:**

- **Type:** 8 bays
- **No of families:** 8 families
- **Year of build:** 1993.
- **Designed by who (local authority or social housing body):**  
Local authority
- **Location: Near facilities/or isolated, any other comments:**  
Near services

## Design:

- **Special features re-layout:** Spacious, good access and space between bays, wide entry road onto the site and in the site. 4 bays on either side of the road.
- **What do the facilities include:** Old design in need of upgrading but met the needs as identified when it was first built. There are concrete units with bathrooms and kitchen, good-sized yards, well-kept areas, and yearly winner of the tidy towns. Communal spaces are planted with flowers in the summer.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** There is the provision of a workspace unit on one of the yards to uphold the tradition of mental working within the community. This was emphasised as important for mental health and well-being. Also, the size of the yards allows for vehicular access for vans used in work.
- The site is due to be upgraded and there is land behind the site to do this. The family are seeking a group housing development. Families are looking for a bedroom to be integrated into the kitchen and bathroom area for ease of access to facilities at night time. Going out of the caravan to use the toilet at night is proving difficult for older people and unpleasant for families in cold weather.
- **Other positive or negative design features?**

## Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** The family on the site are organised. They meet in the summer together and agree on tasks for the upkeep of communal areas such as painting and flower beds. They work with the local authority to ensure the site is maintained. The local authority provides funding for plants etc., in summertime.
- They have met the local authority individually and together to map out the development.
- **What were the elements that could have been improved?**  
**In cases of poor accommodation:** N/A
- **What were the factors adding to the above that led to the accommodation being unsuccessful?**

- **What should have been put in place to achieve better outcomes?**

#### **Management:**

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term:** The family have an ongoing purposeful relationship with the council. They are at the early stage of discussion regarding the redevelopment of the site into a group housing scheme.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** They recommend clear communication, regular meetings with the council, addressing issues early on, an underpinning commitment to upholding the traditions of the Traveller community. A design needs to be agreed upon and signed off on so that everyone knows where the situation stands.

#### **Any other comments:**

- It was stressed that each Traveller's family places a different emphasis on traditions and this needs to be explored with each family as part of the agreement of design.
- 

### **9.2.6 Field Study 6**

#### **Accommodation Details:**

- **Type:** 6 bays
- **No of families:** 10 families. There is overcrowding as young families are waiting for the development of group housing at the back of the site. The development of 4 group houses at the back of the site has been prioritised due to the poor living conditions. In parallel, the existing units will be upgraded.
- **Year of build:** 1998
- **Designed by who (local authority or social housing body):** Local authority
- **Location: Near facilities/or isolated, any other comments:** Near services

## Design:

- **Special features re-layout:** Narrow entry to the site. Good space within the yard but no space in the site to turn a car. The site is shaped in a square.
- **What do the facilities include:** There are concrete units with bathrooms and kitchen and small seating area. The yards are a good size and are well-kept areas. The families have upgraded the day units themselves putting in stoves and taking down steel door and steel bathroom furnishing and replacing them with modern designs. The young families doubling up are under great pressure and have to share a small toilet and kitchen with two other families.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** There are sheds on the site put in by families themselves and they use these for storage. There is no space on site for any activity.
- Some of the men keep horses and would like a space to bring in a horse trailer in the new development. This was emphasised as important for mental health and well-being. They don't want a paddock near the accommodation or stable facilities as they rent land in the surrounding area.
- The site is due to be upgraded. The family are seeking a group housing development as they would like a bedroom to be integrated into the kitchen and bathroom area for ease of access to facilities at night time. Going out of the caravan to use the toilet at night is proving difficult for older people and unpleasant for families in cold weather.
- **Other positive or negative design features?**

## Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** Yes, two council officials met each family individually to assess their needs. The council then met the families collectively with the architect to assess group needs. The family met with the council again and were shown mock-up plans of the proposed development. They inputted and the plans were adapted to meet their needs. The Traveller support group and the families also met parallel to this process to discuss issues emerging and prepare for the meetings with the local authority. The local authority and the families signed off on the plan which went to Part 8.

- **What were the elements that could have been improved?**  
The long-time waiting for the development to start could be improved
- **In cases of poor accommodation:** N/A
- **What were the factors adding to the above that led to the accommodation being unsuccessful?**
- **What should have been put in place to achieve better outcomes?**

#### **Management:**

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term:** The family have an ongoing purposeful relationship with the local authority. They are at the early stage of discussion regarding the redevelopment of the site into a group housing scheme.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** They recommend clear communication, regular meetings with the local authority, addressing issues early on, and an underpinning commitment to upholding the traditions of the Traveller community. A design needs to be agreed upon and signed off on so that everyone knows where the situation stands.

#### **Any other comments:**

- It was stressed that each Traveller's family places a different emphasis on traditions and this needs to be explored with each family as part of the agreement of design.
-

### 9.2.7 Field Study 7

#### Accommodation Details:

- **Type:** 10 bay Halting site
- **No of families:** 14 families
- **Year of build:** 2005
- **Designed by who (local authority or social housing body):**  
Local authority
- **Location: Near facilities/or isolated, any other comments:**  
Very isolated accommodation beside a quarry. It is more like a compound than living accommodation as it's surrounded by a 5 metre wall encircling the whole site. A school has since been built nearby which has made it easier for the families. The school is the only service that is accessible from the accommodation. Very isolated.

#### Design:

- **Special features re layout:** None
- **What do the facilities include:** Very poor huts, small bays with minimum facilities. It is a narrow site with one entry and exit route, and the pathways are not accessible. Poor maintenance with rats and chronic dampness. There is a 5 metre wall encircling the perimeter of the site which was described as 'depressing'.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** None
- **Other positive or negative design features?**

#### Consultation:

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** No
- **What were the elements that could have been improved?**  
N/A



- **In cases of poor accommodation: What were the factors adding to the above that led to the accommodation being unsuccessful?** Families were told by the local authority in 2005 that if they accepted the site and moved in the foundation was there to build on rooms as required but this has not been done. 16 houses are needed. This was described as a breach of trust.
- **What should have been put in place to achieve better outcomes?** Working with the family in a genuine consultation process leading to clear outcomes for upgrading of the site.

#### **Management:**

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term?** There is a caretaker but the role is minimal. The caretaker cuts the grass and puts down rat poison each year. The water pressure is bad and overall maintenance is poor.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** Real and meaningful consultation with Travellers leading to agreed outcomes.

#### **Any other comments:**

- The quality of caravans are not suitable for longer-term living

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### **9.2.8 Field Study 8**

#### **Accommodation Details:**

- **Type:** Transient site
- **No of families:** 1 family
- **Year of build:** 2012
- **Designed by who (local authority or social housing body):** Developed by the local authority and managed by a state agency.
- **Location: Near facilities/or isolated, any other comments:** Yes, near transport and schools.

### **Design:**

- **Special features regarding layout:** None, very basic, just a hard surface with a chalked-out space with caravans written across it. Prefabricated unit with toilet and sink.
- **What do the facilities include:** Basic
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** None
- **Is it easy to maintain, is it easy to heat, can it adapt to changing needs (future proofing)?** Yes, extra space was reserved to add additional bays if needed.
- **Other positive or negative design features?** Plans to redevelop it into a 5 bay halting site with a play area: None

### **Consultation:**

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** The 5 families have been identified and are in discussion with the agency about the design. The local Traveller support groups are involved in supporting the families in the process.
- **If so, what were the key elements that made this a successful process?** Open communication, clear targets, and signoff on key decisions at different stages of the process. Dealing with issues as they arise. Families are supported to advocate for what they want by the Traveller group.
- **What were the elements that could have been improved?**

### **Management:**

- **What are the key factors that led to successful/ unsuccessful management of Traveller accommodation in the long term?**
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?**

### Any other comments:

- The provision of transient sites hasn't worked due to the absence of longer-term provision. A study is being commissioned to examine this on an all island basis.
- 

### 9.2.9 Field Study 9

#### Accommodation Details:

- **Type:** Halting site but families have put in Western Style Units on their bays/pitches – 16 pitches plus 4 in adverse possession. One area of the site which was a transit site was sold to one family who are operating a business from the site and have lived there for 20 years. They have erected their own home and work independently of the agency normally responsible.
- **No. of families:** 20 families all related.
- **Year of build:** 1988
- **Designed by who (local authority or social housing body):** Developed by the local authority and managed by the Agency. Normally the said agency does not manage accommodation.
- **Location: Near facilities/or isolated, any other comments:** Yes, near transport and schools. Sheltered site is off the road. Very private.

#### Design:

- **Special features regarding layout:** Large yards wide enough for 2 caravans.
- **What do the facilities include:** Days units are dilapidated and need refurbishment. The units are being upgraded as utility spaces as most families have all the services they need in their Western Style homes. One family is having the day unit fully upgraded as they still live in a caravan.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** There is workspace activity on many of the bays. The agency enables the families to conduct their own work as they see fit. The agency responds to any queries/repairs rapidly as they are committed

to providing a good service to Travellers and this also contributes to good relations on the site.

#### **Consultation:**

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** The site has evolved over time and the agency facilitates this now. It is a legacy site and has been under-resourced over the years. Their goal is to support the families and build good relations with them.
- **If so, what were the key elements that made this a successful process?**
- **What were the elements that could have been improved?**

#### **Management:**

- **What are the key factors that led to successful/unsuccessful management of Traveller accommodation in the long term?** The family are empowered to maintain the site. A caretaker comes into the site to assist with any repairs. There is a Good Relations officer employed by the agency with a very good relationship with the families who is in constant contact. This ensures the ongoing communication and any issues get dealt with quickly.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** The person from the local authority who liaises with the families must have training on working cross culturally and have respect for the community upholding their human rights.

#### **Any other comments:**

- The provision for work activities is vital to the health and well-being of the community. This is a design aspect that needs to be factored in given the exclusion of Travellers' experience from the labour market.
-

## 9.2.10 Field study 10

### Accommodation Details:

- **Type:** Halting site
- **No of families:** 9 families all related
- **Year of build:** 2013
- **Designed by who (local authority or social housing body):**  
Developed by the local authority and managed by the relevant agency.
- **Location:** Near facilities/or isolated, any other comments: Yes, near transport and schools. Sheltered site is off the road. Very private.

### Design:

- **Special features regarding layout:** Horseshoe shape, large yards wide enough for 2 caravans.
- **What do the facilities include:** Comfortable day units, bathroom, kitchen and small seating area.
- **Is there provision for cultural, educational, community, childcare, disability, retail, health etc?** Yes, there is a green area which was supposed to be for children but wasn't fully developed. There are large sheds for work activity to the back of the site. The site is designed with a space to turn larger work vehicles and caravans. There was a community centre but this has been turned into a house for one of the families with special needs.
- **Is it easy to maintain, is it easy to heat, can it adapt to changing needs (future proofing)?** Yes, extra space was reserved to add additional bays if needed. Currently, they are green areas.
- **Other positive or negative design features?** Very nice design and well maintained accommodation.

### **Consultation:**

- **Was there a consultation process put in place with Travellers on the design of the accommodation?** The family were fully involved in the design of the site and their requirements were delivered.
- **If so, what were the key elements that made this a successful process?** Liaison with the Traveller families and the council, trust, willingness to work through issues as they arose, clear information, and reassurance to families that the accommodation would be built
- **What were the elements that could have been improved?** The family were happy with the process but would like to see all elements such as the children play area finalised.

### **Management:**

- **What are the key factors that led to successful/unsuccessful management of Traveller accommodation in the long term?** The family are empowered to maintain the site. A caretaker comes into the site to assist with any repairs. There is a Good Relations officer employed by the Agency with a very good relationship with the families who is in constant contact. This ensures the ongoing communication is good and any issues get dealt with quickly.
- **What key recommendations would you make to ensure the best outcomes for Travellers/sustainability of Traveller accommodation in the longer term?** The person from the local authority who liaises with the families must have training on working cross culturally and have respect for the community upholding their human rights.

### 9.3 Appendix 3: Meetings/Workshops

#### Group 1

##### Concerns:

- The footprint for Traveller accommodation is being seriously reduced. Recognition of the challenges for the county council to build social housing but the halting sites that are already in place should be secured. It is difficult to understand why the council cannot secure the space Travellers already have and ensure their cultural needs are met. It is a concern that the needs of Travellers do not appear to be a priority. We are concerned that prejudice is the root cause of this.
- In two identified sites the needs of the families are not at the forefront in the redevelopments. The space Travellers occupy is being reduced in proposed redevelopment cutting out opportunities for Travellers to uphold their culture.
- The standard of some existing accommodation is very poor. In one halting site the day units are damp and there is rat infestation. Where Travellers have moved out and bays have been closed off dumping is taking place eroding the remaining resident's quality of life.
- On halting sites Travellers must provide their own caravan. Travellers can access a caravan loan scheme for a loan of up to 40k. This is not sufficient to secure a caravan for longer-term living. The caravans depreciate over a few years and the loan still must be repaid.
- Many Travellers are paying rent for largely substandard accommodation and paying off caravan loans on substandard caravans. This is a poverty trap.
- As the standards on some halting sites are poor with Travellers opting for standard housing.
- There will be no space allocated for the keeping of animals in the council developments. They have notified families of this.
- Future proofing is not progressing in this area.

### **Need for consultation:**

- Genuine consultation leading to positive outcomes for Travellers is crucial. Traveller culture as they define it through the design process must be central. We are working cross-culturally and learning from Travellers what they need.
- The right people need to be at the table. In the case of one site, the architect never attended any of the 22 meetings held about the redesign of the site. This was frustrating for the residents and stunted progress.
- The process needs to be facilitated to build trust, ensure commitments are delivered and the necessary outcomes are achieved within an appropriate time frame. An independent broker could be used to achieve this in cases where the trust between the local authority and Travellers has broken down.
- Traveller groups should be resourced to support residents to organise and represent themselves at meetings with the councils. Families should feedback and we need to ensure there is a collective approach.
- Expectations can be managed if there is an honest process in place and decisions about the design are being made by the design group.

### **Workshop on Traveller accommodation design (8 participants)**

#### **Key points on design**

- Our culture needs to be considered. This needs to be a key part of the design.
- The outside space is important, it needs to be functional as it is where the cultural aspects can be built in. There needs to be enough room for a touring caravan, a shed, a workspace (whichever is needed). There has been a trend of not providing yards big enough to hold a caravan. This is taking something important away from some Travellers.
- Caravan loans are not being given out in this area. But this area should be looked at to enable Travellers to continue to live their way of life.
- Small developments are very suitable for Travellers and work well.



- The location of Traveller accommodation is crucial. They need to be beside services. Priorities are hospitals and schools.
- The needs of families will change over time and this should be factored into design. For example, regarding older Travellers and, in the case of halting sites, the provision of an integrated unit with a room, bathroom and kitchen or in the case of a house, a room downstairs should be standard.
- If the family can be identified and matched to the development this could work well. The family can then be consulted on the suitability of the location and then on all aspects of the development.
- Currently, group housing is not an option on the housing list. Yet 3 group housing schemes are needed in the county.
- Forward planning is very important so that younger families are not left homeless or in overcrowded conditions.
- The site should be accessible with ease of entry and access.
- Timber homes could be explored as an option for some families.

### **The consultation process**

- The involvement of Travellers in the design and management of their own accommodation is critical. They are the experts on their own needs. The involvement of the local Traveller organisation (where there is one) is also important. Traveller organisations can support families to engage with the council and organise themselves so they can put their ideas forward.
- Trust, communication and confidentiality between Travellers and the local authority are essential elements needed to build sustainable accommodation with Travellers. If Travellers are supported to design their accommodation with the council and this accommodation is delivered this will ensure the continued success of the accommodation in the future. It's about building ownership.

- One of the key elements that erodes trust is the lack of action. There are numerous examples of lack of delivery of accommodation and no action on repairs in existing accommodation.
- The consultation process on design should be time lined with clear outcomes minimum of 6 months and a maximum of a year.
- There should be regular meetings between the families and the council to get it right. Problem-solving should be a large part of this. If the council has constraints, they need to be honest from the beginning and Travellers can work around this. There needs to be a commitment to getting the design right.
- Turnover of staff is a problem and often the right people with the expertise are not available.
- There needs to be training on working cross-culturally and on Traveller culture and identity so that new people are brought up to speed.
- The architect should be available to work on the project and a senior official who is mandated to make decisions. This would ensure the process flows more efficiently.
- Allocation policies needs to be adapted to allow for family developments

#### 9.4 Appendix 4: Key Consultees alphabetical

- City and County Management Association
- Local Government Management Agency
- Offaly County Council
- Kildare County Council
- Dublin City Council
- Galway County Council
- Galway City Council
- South Dublin County Council
- Dun Laoghaire Rathdown County Council
- Association of Irish Local Government
- National Traveller Accommodation Consultative Committee
- Housing Executive – Northern Ireland
- Department of Housing, Local Government and Heritage
- Office of the Planning Regulator
- Housing Agency
- Irish Traveller Movement
- Pavee Point
- National Traveller Women’s Forum
- Other Traveller Organisations
- Travellers
- CENA
- Cluid
- Circle
- Offaly Stakeholders
- Traveller Residents
- Traveller Representative Bodies

## 9.5 Appendix 5: Site Assessment Tool

The table below is designed to help designers, with input from the families to be accommodated, to choose the best site from the appropriately zoned land that may be available. Please refer to earlier comments on site selection including guidance in part 7 of the report above.

**Table 3.1: Site Selection Tool (categories and maximum scores below are presented following consultations associated with this report)**

<b>CRITERION- distance of site being examined to the following:</b>	<b>Maximum Score</b>	<b>SCORE for site</b>
Family (already in accommodation)	20	
Shopping	20	
Garda station	8	
Health services	14	
Schools	18	
Footpaths to services	14	
Community centre	4	
Social Welfare Office	2	
Pub	2	
Place of worship	8	
Landfill, Adjacent Industrial Building, Sewage treatment works	-20	
Hospital	10	
<b>TOTAL</b>	<b>100</b>	

### Site Ranking:

**STEP 1:** Verify that the criteria and maximum score figures given above are acceptable or amend as decided.

**STEP 2:** Fill out one table for each site being assessed (for example if a site is adjacent to shops it might score 19 in the above example).

**STEP 3:** Compare the scores for the various sites that are available.

## 9.6 Appendix 6: Summary of Terms of Reference

The Report was to consider:

- Urban and rural location requirements and site selection
- Access to facilities and services (schools, shops, public transport, medical services, infrastructure, and utilities connections)
- Visibility and integration with wider residential area
- Accessibility
- Future-proofing in terms of predicted growth in demand; flexibility/adaptation of day houses
- Space requirements to ensure adequate space for social interaction/play areas and cultural activities
- Locations and layout of schemes that minimise risk of anti-social behaviour by evaluating the applicability of the design guidance provided in the Department's Design Manual for Quality Housing

In addition, the Report was to include:

- Guidance on defining halting sites and group housing
- Design for safety (Traveller specific considerations in relation to fire, services connections, site capacity and access)
- Design for energy efficiency
- Design for ongoing maintenance including waste disposal, drainage, access, lighting, etc.
- Cost effective design
- Level of data available on the existing TAU Housing Stock, what extent current information is available on age and BERs for example and therefore what level of Retrofitting might need to take place to meet 2030 Energy Requirements
- Design for future proofing (e.g., attic conversion in Group Housing Scheme) and how to provide adequate space to

accommodate the expansion of families and reduce the possibility of overcrowding

- Design that is adaptable as people age, or as their requirements change due to disability consistent with emerging policy and requirements in this regard
- Specific design adaptations where possible to include for Traveller culture (animals, location of house/day unit/mobile on site to include adequate green space, shed, Traveller economy or space for a campervan)
- Review best practice in the development and design in jurisdictions such as Northern Ireland, to inform the recommendations
- Review the impact of national strategies on the development and design of Traveller-specific accommodat



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