



OPR Case Study Paper CSP03

Traveller Accommodation and the Local Authority Development Plan



**Oifig an
Rialaitheora Pleanála**
Office of the
Planning Regulator



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OPR Case Study Papers (CSP) provide investigative research and analysis on specific areas of the planning system for practitioners, elected members and the public.

The intention of the Case Study Papers is to support planning authorities in the performance of their duties. For the avoidance of doubt, Case Study Papers do not have the status of Ministerial Guidelines under Section 28 of the Planning and Development Act 2000, as amended.* They are issued to promote shared learning and highlight best practice, in accordance with the OPR's statutory remit to engage in education, training and research activities. Case Study Papers cannot be relied upon as containing, or as a substitute for, legal advice. Legal or other professional advice on specific issues may be required in any particular case.

Any comments/feedback in relation to this Case Study Paper may be sent to research@opr.ie.

*herein referred to as the '2000 Act'.

1.0 Introduction

This case study paper (CSP) has been prepared following engagement between the Office of the Planning Regulator (OPR), the County and City Management Association (CCMA), the Department of Housing, Local Government and Heritage (DHLGH) and the Traveller Accommodation Expert Group.

By way of background context, the Traveller Accommodation Expert Group was established in 2018, by the then Minister of State at the Department of Housing, Planning and Local Government, with special responsibility for Housing and Urban Development, Damien English TD. The aim of the Expert Group was to review the effectiveness of the Housing (Traveller Accommodation) Act, 1998 and to review other legislation that impacts on the delivery of Traveller-specific accommodation.

In July 2019, the Traveller Accommodation Expert Review report was published. Amongst a wide range of recommendations in relation to enhancing Traveller accommodation in general, the report identified three planning process related issues, namely: inadequate connection between the Housing (Traveller Accommodation) Act, 1998 and planning legislation, lack of adequate planning guidance for planning authorities concerning Traveller accommodation and lack of monitoring and reviewing of development plans and how they relate to Traveller-specific accommodation.

Since the establishment of the OPR in 2019 and through the discharge of the Office's statutory functions including the oversight of local authority plans, reviews of systems and procedures used by planning authorities, examinations of complaints, and conducting planning research and training, the OPR has endeavoured to support the work of the Expert Group and the DHLGH in implementing the recommendations of the Expert Review.

This CSP specifically addresses recommendation No. 5 under the '*planning*' theme of the Expert Review to "*request research and a review by the Office of the Planning Regulator (OPR) of Traveller accommodation policies and objectives in statutory development plans.*"

Additionally in keeping with the goals and objectives of the OPR's Planning Research Framework it is intended that this CSP will assist in addressing knowledge gaps, provide support for practitioners and planning authorities and highlight best practice to foster shared learning.

Acronym List

- > **AHB:** Approved Housing Body
- > **CCMA:** County and City Management Association
- > **CSP:** Case Study Paper
- > **DHLGH:** Department of Housing, Local Government and Heritage
- > **DP:** Development Plan
- > **EMRA:** Eastern and Midland Regional Assembly
- > **HAP:** Housing Assistance Payment Scheme
- > **HNDA:** Housing Need and Demand Assessment
- > **ITM:** Irish Traveller Movement
- > **LAP:** Local Area Plan
- > **LTACC:** Local Traveller Accommodation Consultative Committee
- > **NPF:** National Planning Framework
- > **NPO:** National Policy Objective
- > **NWRA:** Northern and Western Regional Assembly
- > **NTACC:** National Traveller Accommodation Consultative Committee
- > **NTRIS:** National Traveller and Roma Integration Strategy
- > **OPR:** Office of the Planning Regulator
- > **RAS:** Rent Accommodation Scheme
- > **SRA:** Southern Regional Assembly
- > **TA:** Traveller Accommodation
- > **TAP:** Traveller Accommodation Programme
- > **THU:** Traveller Health Unit



Traveller Accommodation Glossary - Relevant Terminology

Bay: A planned area which consists of a parking space for a caravan/mobile home and a smaller house structure (see also *'Tigín'*) with kitchen, bathroom facilities and other service facilities.

Demountable Dwelling: A dwelling which can be moved and relocated.

Encampment: Unauthorised occupation of land (local authority and privately owned land) by members of the Travelling community. Also known as *'Illegal Encampment'*.

Group Housing: The accommodation of a number of Traveller families at the one location or where large extended families live together based on Traveller's shared identity.

Halting Site: Purpose-built residential accommodation for Travellers, provided by a local authority. Halting sites generally comprise bays, where an individual bay can host a family unit. Also known as *'Serviced Halting Site'* or *'Halting Bay Site'*.

Housing Assistance Payment Scheme (HAP):* The HAP scheme is a social housing payment support for people identified as having a long term housing need. It is available from all local authorities. Local authorities' manage the payment of rent to landlords directly with this scheme. Under the HAP scheme, housing support can still be supplied if the recipient is in full-time employment.

Rent Accommodation Scheme (RAS):* Local authorities provide this rent assistance payment scheme, for those who avail of rent supplement on a longer term basis.

If a tenant avails of rent supplement for 18 months they are eligible to apply for RAS. See *'Rent Supplement'* below. Recipients of RAS, can take up work on a full-time basis, with a recalculated rent.

Rent Supplement:* A short-term means tested payment scheme to assist those living in private rented accommodation who do not have the means to cover the total cost of their rent. A tenant availing of rent supplement for more than 18 months is eligible to apply for the rent accommodation scheme. See *'Rent Accommodation Scheme (RAS)'* above.

Serviced Halting Site: A site where Travellers caravans and mobile homes can be accommodated in bays which have serviced units. See also *'Halting Site'* above.

Temporary/Transient Halting Site: Site erected on a temporary basis by a local authority with both serviced and unserviced bays.

Tigín: A small house structure comprising a kitchen, bathroom and living area often placed within a bay of a halting site. This serves as infrastructural support to caravans/mobile homes parked in the bay.

*HAP and RAS Schemes and Rent Supplement are general social housing supports and are not unique to Traveller-specific accommodation.

2.0 An Overview of the Policy Context



The **Programme for Government 2020**, is focused on ensuring that the accommodation needs of the Traveller community are met by local authorities and that capital funding programmes for such

accommodation are drawn down and utilised. In addition, a number of actions are identified to support the Traveller community in the areas of health, education and employment.

Key policies and legislation of relevance to the spatial planning aspects of the provision of Traveller accommodation are outlined as follows:

The **Housing (Traveller Accommodation) Act 1998** requires that each local authority, following a consultation process, must prepare, adopt and implement a five-year rolling accommodation programme to meet the existing and projected accommodation needs of Travellers in their areas.

Each local authority's Traveller Accommodation Programme (TAP) then provides a road map for its investment priorities over the period of the programme and forms the basis for the annual allocation of funding from the DHLGH.

The **Planning and Development Act 2000**¹, as amended, also requires that the land use aspects of TAPs should be reflected in the local authority's development plan. Under Section 10(2)(i) of the 2000 Act the development plan must include objectives for "*the provision of accommodation for travellers, and the use of particular areas for that purpose.*"



Further advice for planning authorities is set out in the **Planning Guidelines on Development Plans (2007)**², as issued by the Minister under Section 28 of the 2000 Act. These clearly stipulate that the development plan should:

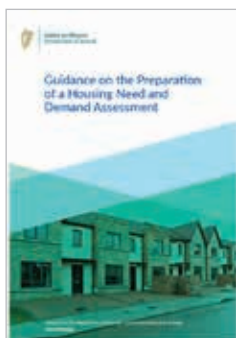
- > Include objectives that clearly set out the approach of the development plan in addressing the accommodation needs of the Traveller community;
- > Provide an indication of the specific locations of known Traveller accommodation projects;
- > Support the identification of additional locations for such projects;

¹ Hereafter referred to as the '2000 Act'.

² These are currently the subject of review. A consultation process on new draft guidelines commenced in August 2021; it is expected that these will be finalised later in 2021 after a period of stakeholder consultation.

- > Ensure zoning policies are flexible to reflect the urgent need to secure additional Traveller accommodation over the lifetime of the plan; *and*
- > Should have regard to other guidelines issued by the Department.³

The requirements of the 2000 Act together with the 2007 Planning Guidelines set a clear context for the planning process in addressing the provision of accommodation for the Travelling community in the statutory development plan.



There have also been recent policy developments⁴ in relation to the obligation for each local authority to prepare a **Housing Need and Demand Assessment (HNDA)**, which emanates from the **National Planning Framework (NPF)**.⁵

The requirement for a HNDA places additional obligations on planning authorities to ensure that there is a strong evidence base for their development plans, housing strategies and all related housing policy outputs.

It is a requirement that the HNDA specifically addresses specialist needs categories including Traveller accommodation. This will require that an estimate of the numbers and types of housing for the relevant period will, in turn, inform the housing strategy and influence the land use zoning objectives in the development plan.

The HNDA process is new and, over time, will provide greater clarity in ensuring the accommodation needs of Travellers are identified and met. However, there will be a lead-in time before each local authority has a HNDA in place and before their development plan is fully aligned to give effect to it in terms of land use requirements.

In the interim, and based on established guidance, this CSP serves to highlight the current practice and highlight best practice and learnings, for sharing across the sector.

In particular, this CSP seeks to demonstrate how TAPs are allied to their spatial expression in the development plan, in order to ensure that the accommodation needs of the Traveller community are properly planned for and addressed by local authorities.

³ Guidelines for Residential Caravan Parks for Travellers (1997), Guidelines for Traveller Accommodation: Basic Services and Facilities for Caravans pending the provision of Permanent Accommodation (1998), Guidelines for Accommodating Transient Traveller Families(2000) and Guidelines for Group Housing for Travellers (2002).

⁴ Circular Letter Housing, 14/2021 and associated Guidance on the Preparation of a Housing Need and Demand Assessment. DHLGH, issued April 2021.

⁵ National Policy Objective (NPO) 37.

3.0 Traveller Accommodation in Context

3.1 Irish Traveller Community

The Irish Traveller community was officially recognised as an ethnic minority by the Irish state in March 2017.

Subsequently the **National Traveller and Roma Inclusion Strategy (2017-2021)** was published by the Department of Justice and Equality. Traveller-specific accommodation was one of the key listed actions in this strategy which states:

“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 to Traveller-specific accommodation.”

Key areas of concern in regards to Traveller-specific accommodation in the **Spotlight Review on Traveller Accommodation**⁶ undertaken in 2018 were noted as:

- > Provision of substandard or culturally inadequate accommodation;
- > The Travelling community experiencing discrimination, stereotyping and harassment;

- > No Traveller-specific identifier within social housing applications; *and*
- > Fire Safety.

Subsequently the Expert Report, referred to at the start of this paper, highlighted that addressing the concerns of the Travelling community would benefit from reforms at national and local level. The planning process has an important role to play in this context.

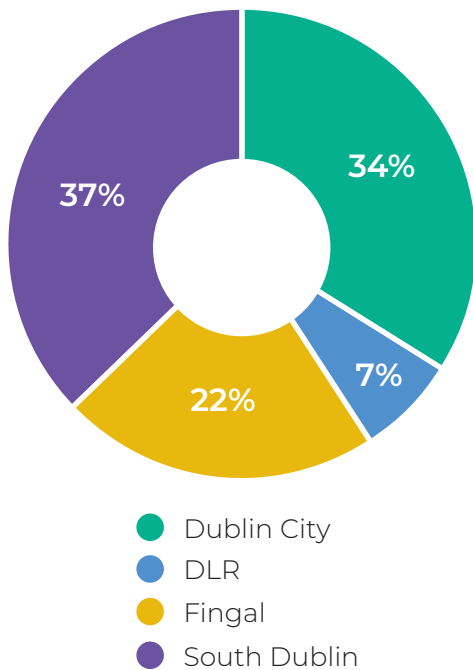
Participation of members of the Travelling community with the processes and structures at local government level, is vital to inform the local authorities' TAP in the first instance and its reflection in spatial planning policy terms through the local authority development plan, as well as wider strengthening of communities and their cohesion.

3.2 The Irish Travelling Community Population in Ireland

In the 2016 Census, a total of 30,987 members of the Irish Travelling community were recorded in the state, an increase of 4.8% on the previous Census figures undertaken in 2011 (29,573). See Table 1 below for more details.

⁶ Spotlight Traveller Accommodation: The Challenges of Implementation. Houses of the Oireachtas (2018).

The 2016 Census saw county Dublin home to 6,006 members of the Travelling community across the four local authorities. 37% within South Dublin, 34% within Dublin City, 22% in Fingal and 7% in Dún Laoghaire-Rathdown. See Figure 1 below.



> Figure 1: Breakdown % of Traveller Population in Dublin Local Authorities (CSO, 2016).

Outside of Dublin, the west, comprising counties Galway, Mayo and Roscommon, was home to 6,061 Travellers in total. Galway had the highest population of Travellers at 4,246 with 2,640 residing in the county council area and 1,606 in the city council functional area.

The lowest recorded Traveller community population was enumerated in county Leitrim at 203, with Monaghan just above it at 276.

Longford had the highest percentage (2.56%) of Traveller community population in relation to the total population of the county, with 1,046 Travellers identified from the 40,873 total population of the county.

However, it is important to note that the overall Traveller population of Ireland is likely to be considerably larger than recorded in the Census figures. The Independent Expert Review highlights that there are large differences between the population identified in the Census and the Annual Estimate of Traveller families.

Other published research⁷ indicates that the undercount in the Census represents a reluctance by the Traveller community to identify themselves due to prejudice and discrimination. There are specific recommendations within the Expert Review, which when implemented, should ensure that future Census and other data sources more accurately capture the characteristics of the Traveller population.

The DHLGH is currently working on amending the Social Housing Support Application Form to include an optional Traveller Identifier, which may assist in capturing better data at a local level in the future.



⁷ A Social Portrait of Travellers in Ireland, Research Series Number 56. ESRI (2017).

Regional Assembly Area	Region and County	Population 2016 '000	Traveller Population 2016	Traveller Community as % of Population
NWRA (North and Western Regional Assembly)	Border	394.3	1928	0.49%
	Cavan	76.2	477	0.63%
	Donegal	159.2	586	0.37%
	Leitrim	32.0	203	0.63%
	Monaghan	61.4	276	0.45%
	Sligo	65.5	386	0.59%
	West	453.1	6061	1.34%
	Galway City	78.7	1606	2.04%
	Galway County	179.4	2640	1.47%
	Mayo	130.5	1299	1.00%
	Roscommon	64.5	516	0.80%
	EMRA (Eastern & Midland Regional Assembly)	Dublin	1,347.4	6006
Dublin City		554.6	2080	0.38%
Dún Laoghaire-Rathdown		218.0	411	0.19%
Fingal		296.0	1315	0.44%
South Dublin		278.8	2200	0.79%
Mid-East		688.9	3264	0.47%
Kildare		222.5	739	0.33%
Louth		128.9	771	0.60%
Meath		195.0	971	0.50%
Wicklow		142.4	783	0.55%
Midland		292.3	3733	1.28%
Laois		84.7	780	0.92%
Longford		40.9	1046	2.56%
Offaly		78.0	905	1.16%
Westmeath		88.8	1002	1.13%
SRA (Southern Regional Assembly)	Mid-West	473.3	3792	0.80%
	Clare	118.8	905	0.76%
	Limerick	194.9	1659	0.85%
	Tipperary	159.6	1228	0.71%
	South-East	422.1	3093	0.73%
	Carlow	56.9	511	0.90%
	Kilkenny	99.2	557	0.56%
	Waterford	116.2	517	0.44%
	Wexford	149.7	1508	1.01%
	South-West	690.6	3110	0.45%
	Cork City	125.7	902	0.71%
	Cork County	417.2	1248	0.30%
Kerry	147.7	960	0.65%	
STATE	Total	4,761.9	30987	0.65%

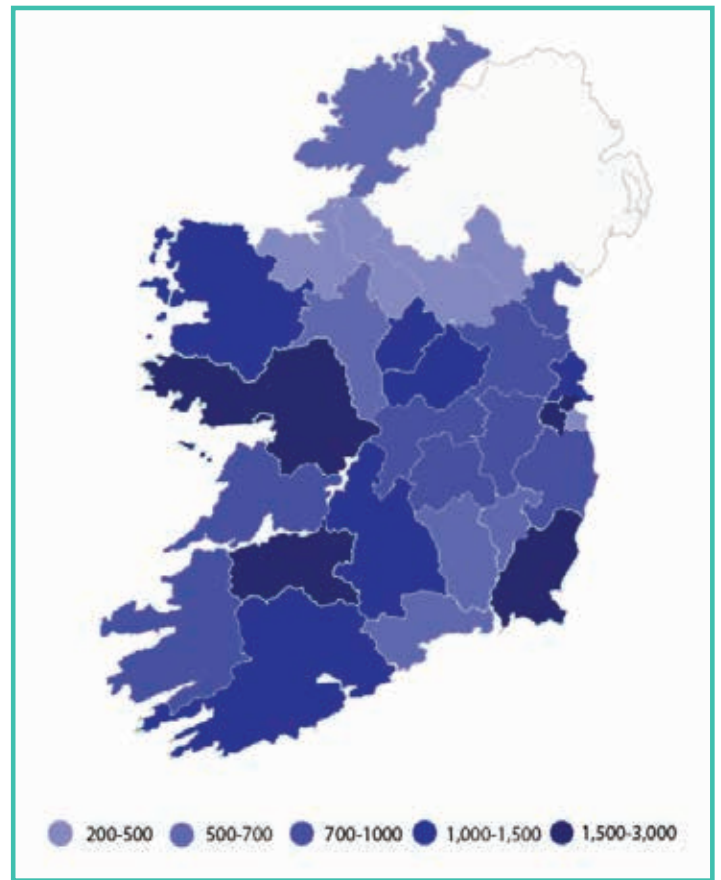
> Table 1: Traveller Population and Overall County Population of the 31 Local Authorities (CSO, 2016).

As outlined in Table 1 above, the Travelling community in Ireland is dispersed unevenly across the 31 local authorities.

After Galway and Longford, the local authorities with the highest percentage of Travellers are Offaly (1.16%) and Westmeath (1.13%).

At the other end of the spectrum, as a proportion of the overall population, Donegal, Kildare, Cork County and Dublin City have circa 0.3%, or less than half the national average (0.65%). Dún Laoghaire-Rathdown, proportionally, has the lowest percentage in the state (0.19%), however in actual terms was home to 411 Travellers in the 2016 Census.

These population figures provide important context for planning authorities. All local authority development plans and TAPs are required to address the existing and projected accommodation needs of members of the Travelling community as per the requirements set out in the Housing (Traveller Accommodation) Act, 1998. However, it would be expected that the local authorities with a higher Traveller population would provide greater detail and be more prescriptive within both their TAPs and statutory development plans.

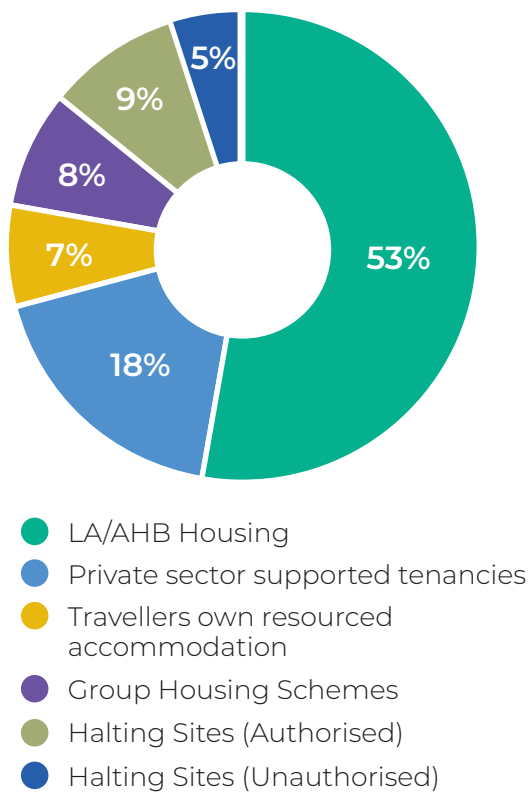


> Figure 2: Traveller Population of Ireland.



Housing for All - A New Housing Plan for Ireland

The government’s recently published housing plan to 2030 has identified that the most recent audited count of Traveller households carried out by local authorities (2019), indicates that there were just under 11,000 Traveller households in the state; 78% of which reside in standard accommodation and 22% within Traveller-specific accommodation, the breakdown is illustrated in Figure 3 below:



> Figure 3: Illustrates the breakdown of Traveller households identified in the 2019 audit.

3.3 Traveller-Specific Accommodation Requirements

Traveller families’ requirements and preferences, specifically in regards to accommodation, can be difficult to quantify.

Some members of the Travelling community fall under the private rental sector; others would prefer to be included in standard social housing accommodation rather than Traveller-specific accommodation.

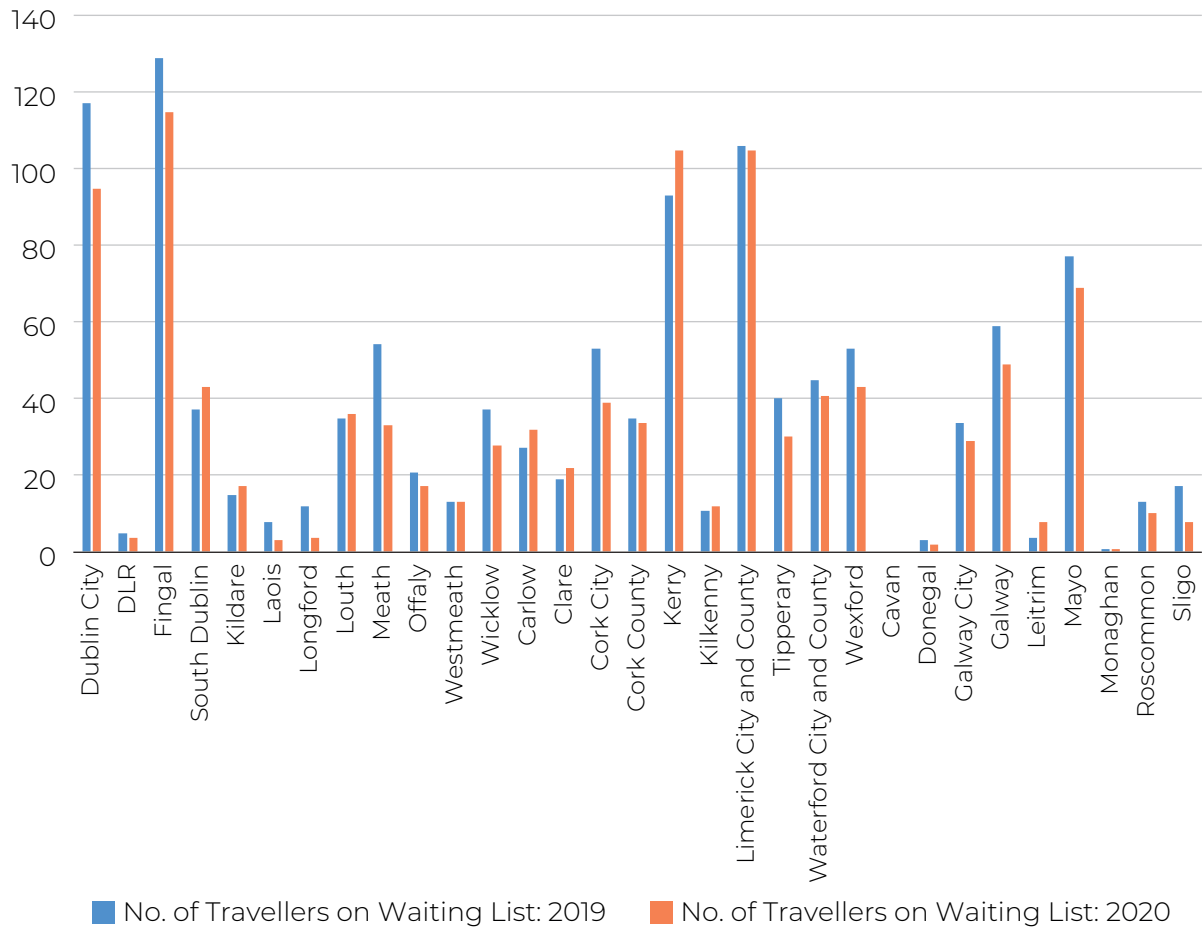
Figure 4 and Table 2 below highlight the number of households who have requested Traveller-specific accommodation across the 31 local authorities, as of 2020.⁸

For clarity, this does not include the total number of Traveller households in need of accommodation. The role of the DHLGH and the local authorities is to ensure accommodation is provided for all Travellers regardless of whether it is Traveller-specific or otherwise. It is the role of the TAP to reflect the total demand.

Fingal had the highest recorded number of Travellers awaiting Traveller-specific accommodation at 115. This is followed by counties Kerry and Limerick with 105 members of the Travelling community on the waiting list. In contrast, Cavan had no recorded members of the Travelling community on the waiting list and Monaghan had only 1 on the waiting list. There has been a decline in Travellers recorded on the 2020 housing waiting list from the previous year across nearly all local authorities.

⁸ Source: Summary of Social Housing Assessments. The Housing Agency (2020).

Traveller Accommodation and the Local Authority Development Plan



> Figure 4: Breakdown of Traveller-specific Accommodation Requirements by Local Authority.



Regional Assembly Local Authority:	No. of Travellers requiring accommodation:	
	2019	2020
EMRA		
Dublin City	117	95
Dún Laoghaire-Rathdown	5	4
Fingal	129	115
South Dublin	37	43
Kildare	15	17
Laois	8	3
Longford	12	4
Louth	35	36
Meath	54	33
Offaly	21	17
Westmeath	13	13
Wicklow	37	28
SRA		
Carlow	27	32
Clare	19	22
Cork City	53	39
Cork County	35	34
Kerry	93	105
Kilkenny	11	12
Limerick City and County	106	105
Tipperary	40	30
Waterford City and County	45	41
Wexford	53	43
NWRA		
Cavan	0	0
Donegal	3	2
Galway City	34	29
Galway County	59	49
Leitrim	4	8
Mayo	77	69
Monaghan	1	1
Roscommon	13	10
Sligo	17	8

> Table 2: Breakdown of Traveller-specific Accommodation Requirements by Local Authority

Note: Top four highest figures highlighted in bold text.

4.0 Traveller Accommodation Programmes

4.1 Traveller Accommodation Programme Policy

The Housing (Traveller Accommodation) Act, 1998, obliges each local authority, following a consultative process, to prepare, adopt and implement a five-year plan for the provision of accommodation for Travellers in their functional areas, a Traveller Accommodation Programme (TAP).

The Traveller-specific accommodation to be provided may include the following:

- > local authority and Approved Housing Bodies (AHBs) housing (including private houses assisted by the local authority through HAP, RAS and long term leasing);
- > group housing schemes;
- > demountable dwellings ;
- > permanent residential halting sites; *and*
- > transient halting sites.

The TAP must also identify the various mechanisms for providing Traveller accommodation including the following:

1. Assistance and incentives for Travellers to build, purchase or improve a private home of their choice.

2. Provision by local authorities of a range of Traveller appropriate accommodation designed around the distinct needs of Travellers.
3. Assistance and supports to the voluntary sector to provide, for rent, a range of accommodation options.

For the purpose of this CSP the second area is our focus, relating to provision by local authorities, as this has the greatest significance and crossover with the development plan, in terms of land use and policy support for capital projects.

Accordingly, the OPR undertook an analysis of the relevant TAPs across the 31 local authorities, unlike the planning legislation where there are mandatory objectives⁹ there is no such specific requirement to set out objectives or policies within TAPs, per se. Nonetheless, it is common practice to include policies and objectives in TAPs in order to reinforce the intentions and actions arising from the TAP. These should not be confused with the mandatory objectives within the meaning of the 2000 Act.

⁹ Section 10 (2) of the 2000 Act.

4.2 Traveller Accommodation Programmes: Review of Current Situation

After a thorough review of the current 31 local authorities TAPs the key findings were:

- > The TAPs across all local authorities include a range of general policy statements and/or objectives that are available to inform the respective development plan, a summary of which can be found in Appendix B.
- > In Kildare, Clare and Offaly's TAPs the listed policies and objectives are incorporated verbatim into the development plan, demonstrating direct policy alignment between the housing and planning functions of the local authorities.
- > Five local authorities included mapping of existing and proposed/indicative Traveller accommodation sites within their TAPs. Of these five authorities, only two mapped this information within their development plans.

- > Six local authorities made reference to horse accommodation and care within their TAPs.
- > All TAPs had general policy statements and objectives in regards to community integration, access to services, suitable Traveller-specific accommodation options, and consultation with the Travelling community.

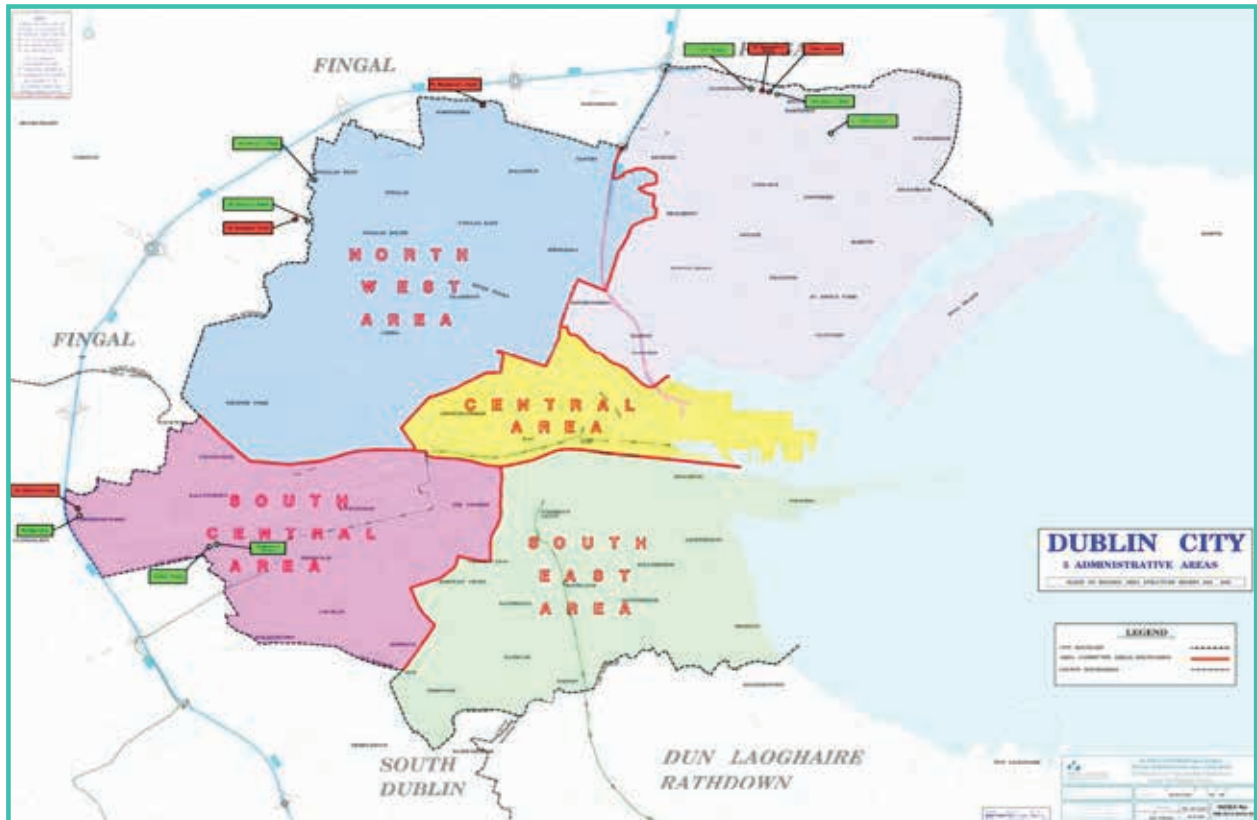
4.3 Traveller Accommodation Programmes (TAPs) with Mapping of Traveller-Specific Accommodation

Five (16%) of local authorities included Traveller accommodation mapping within their TAPs. Three of these local authorities did not include this mapping information within their development plan maps. Included below are five mapping examples from the OPR's review of TAPs with mapping specific to Traveller accommodation.



Dublin City

Dublin City's TAP 2019-2024 includes a map of group housing schemes and halting sites. In this instance, the local authority has differentiated between the two accommodations types relevant to Traveller accommodation, rather than grouping them under the generalised term of 'Traveller accommodation'.



> Map of Traveller Group Housing Schemes and Traveller Halting Sites (2019-2024).

Dún Laoghaire-Rathdown

Within the Dún Laoghaire-Rathdown TAP 2019-2024, existing Traveller accommodation sites and temporary sites, as well as future proposed Traveller accommodation sites are mapped. This is a strong example of a local authority mapping known and proposed Traveller accommodation locations, using separate maps to distinguish between existing and proposed sites. Dún Laoghaire-Rathdown also maps known Traveller accommodation sites within their development plan.



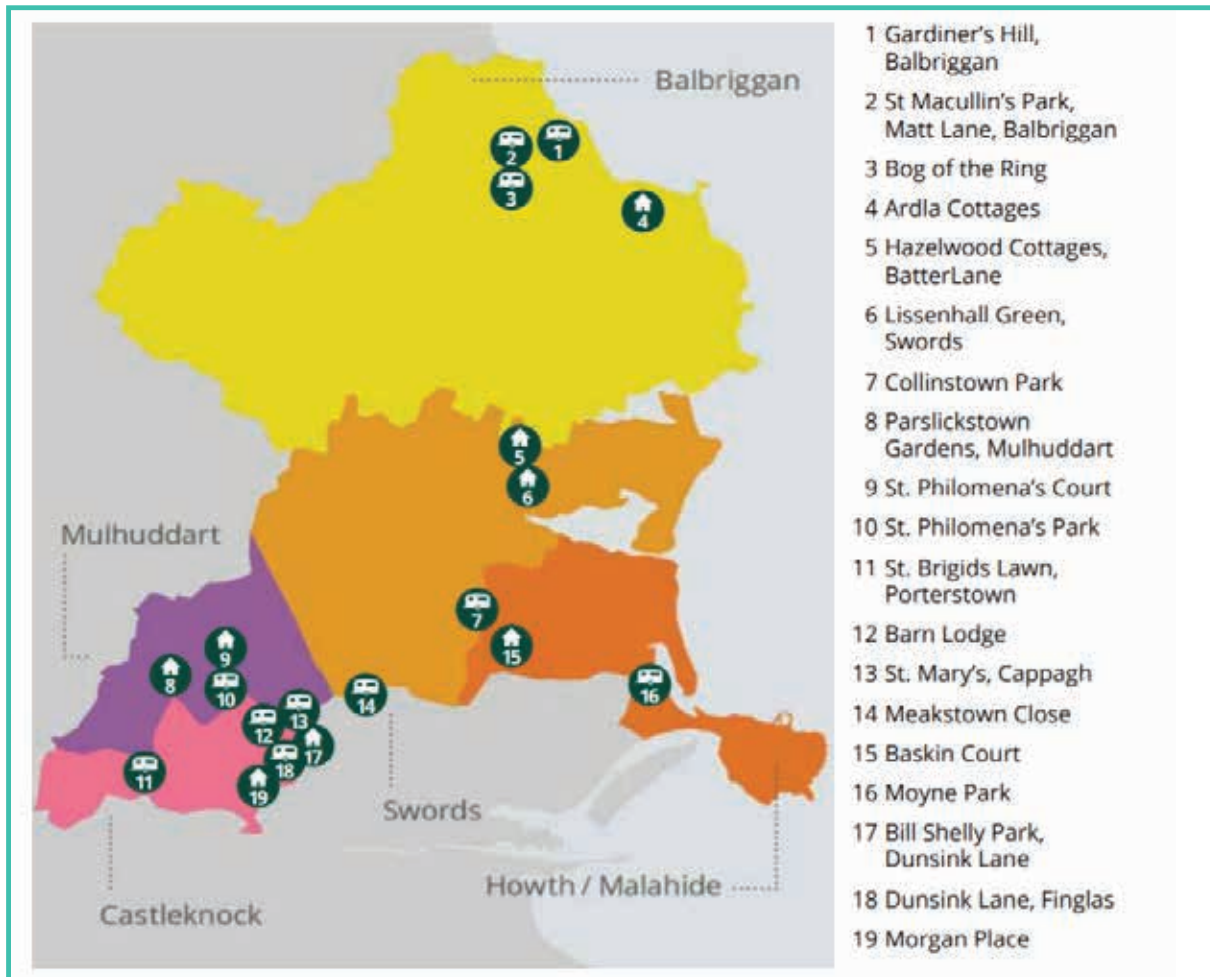
> 1. Map of Existing Traveller Accommodation Sites and Existing Emergency/Temporary Traveller Sites (2019-2024).



> 2. Map of New Sites for the Travelling Community (2019-2024).

Fingal

Fingal County Council's TAP 2019-2024 includes a map and list of existing Traveller accommodation sites and transient site locations. This local authority also includes indicative or proposed sites for future Traveller accommodation within the same map. Fingal also includes this information within maps in the development plan.



- > Map of Existing Sites and Transient Sites of the Travelling Community and Proposed/ Indicative Sites (2019-2024).

South Dublin

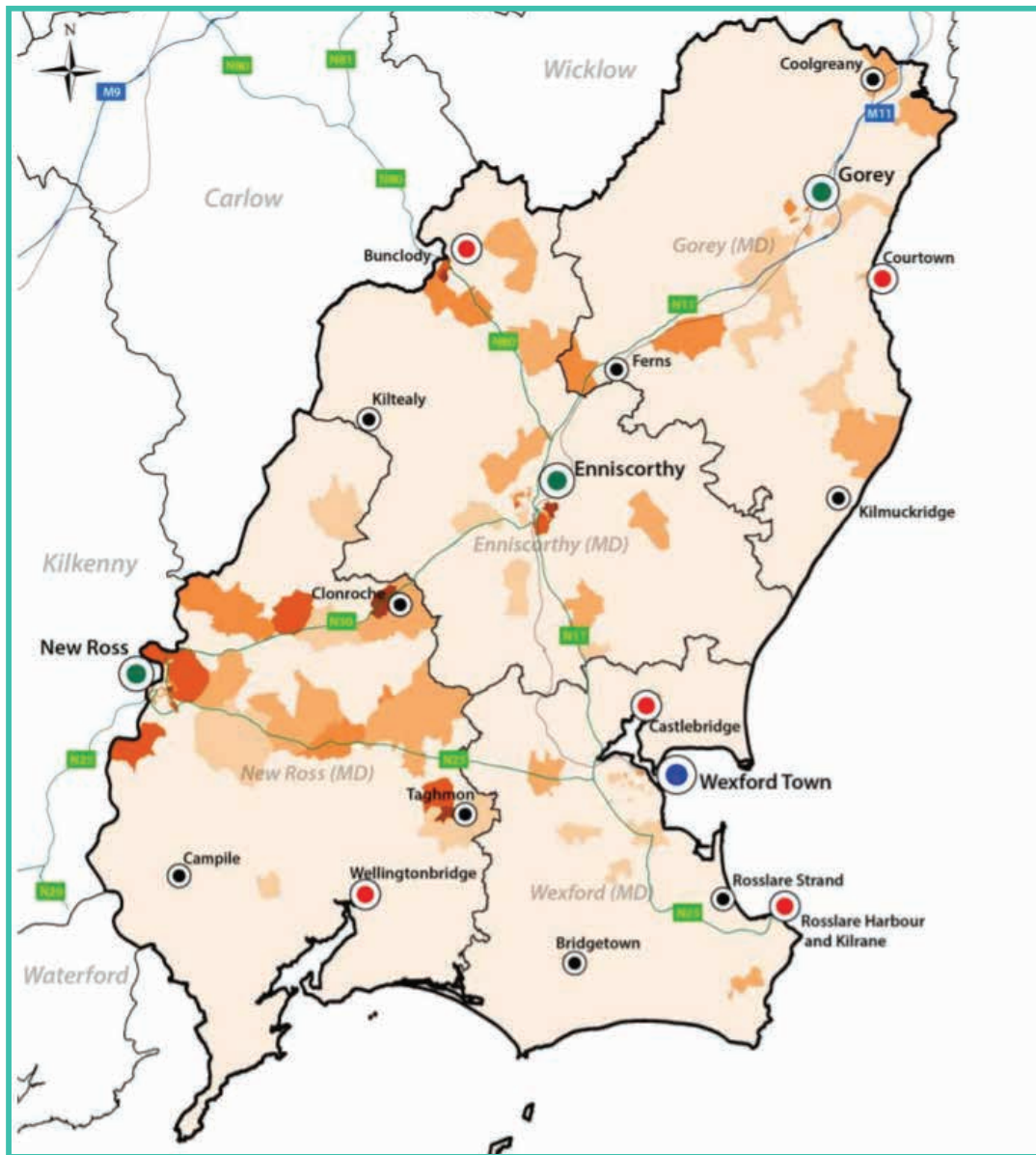
South Dublin's TAP 2019-2024 follows similar mapping and listing of existing Traveller accommodation and proposed sites for future Traveller accommodation as the local authorities mentioned above i.e. Fingal and Dún Laoghaire-Rathdown.



> Map of Existing and Proposed/Indicative Sites for Traveller Accommodation (2019-2024).

Wexford

Wexford's TAP 2019-2024 includes a map of the spatial population of the Travelling community throughout the county of Wexford. This is a useful map in highlighting areas of high Traveller occupation; however no information is included on the Traveller accommodation types.



> Map of Spatial Population of Travelling Community in Wexford (2019-2024).

5.0 Traveller Accommodation in Development Plans

5.1 Summary of the Current Situation

An overall review of the 31 local authorities' current development plans¹⁰ and the associated TAPs was undertaken by the OPR. During this review an emphasis was placed on Traveller-specific 'listed'¹¹ policies and objectives within development plans, and relevant linkages with the TAPs, to ensure actionable outcomes.

The following key observations were made:

- > **All** of the development plans had general policy statements in regards to Traveller accommodation.
- > 94% of local authorities have Traveller-specific listed policies and objectives in their development plans.
- > Two local authorities, whilst including written policy statements in the narrative of their plan, did not include a listed objective relating to Traveller accommodation, as required by Section 10(2)(i) of the 2000 Act.



- > **However, only five development plans included maps** to identify Traveller-specific accommodation.



- > Of the five development plans where mapping of Traveller-specific accommodation was included, **two showed mapping of potential future sites**.
- > A small number of local authorities have indicated an intention to address land use matters associated with their TAP in their local area plans (LAPs).
- > There is a range of approaches to the land use zoning matrix associated with land use zoning objectives across development plans, some expressly include Traveller accommodation as a use, others include only '*halting sites*' as a use and apply land use zoning policy to match.

¹⁰ The review examined 33 development plans in total since both Waterford City and County, and Limerick City and County are currently in the process of preparing their first development plans as newly amalgamated authorities following local government reorganisation in 2014 under the provisions of the Local Government Reform Act 2014. Prior to 2014 Waterford and Limerick had individual development plans for the respective city and county areas.

¹¹ In the context of the research for this CSP 'listed' policies and objectives refers to those that have a policy or objective code or reference e.g. Objective TA 5. It is acknowledged that the narrative and preamble found in development plans will often discuss the council's policies or objectives, which may or may not be carried through to a listed policy or objective.

- > There is a range of different terminology and language used in describing Traveller-specific accommodation across the 31 local authorities. Some local authorities subdivide the different types of Traveller accommodation such as halting sites, transient sites and bays, whereas others use a generic overarching term to describe all Traveller accommodation options.
- > One local authority, Kilkenny, had listed policies in regards to horse accommodation and care within their development plan.

5.2 Existing and Projected Traveller Accommodation Needs

Within the local authorities' development plans, there was a variance in the language used for Traveller-specific accommodation. For example, halting sites were given their own accommodation listing in certain local authorities' plans, where in others they were listed as Traveller accommodation only, without differentiating the accommodation types.

Uniformity across local authorities' use of language and definition of Traveller-specific accommodation would allow for accurate figures and projected needs to be drawn. The generalisation of accommodation needs for members of the Traveller community can be seen in a number of development plans.

The identification of Traveller-specific accommodation needs should be included in the development plan in order to fully support the TAP.

[See also Appendix A for samples of Traveller-specific listed policies and objectives in the current local authority development plans.]

Some local authorities, identified through this research, were more prescriptive in their linkages between the identified needs in their TAP and the Traveller-specific listed policies and objectives within their development plans.

It can be seen through the examples listed in Appendix A that there is an opportunity for the development plans to better draw on the TAP and include specific listed policies and objectives in relation to the following:

Accommodation Requirements

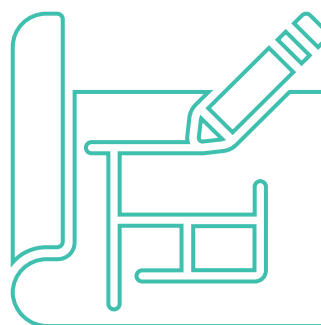
– to accurately reflect the range of accommodation options available to meet the requirements for the Traveller community.

Location of Sites – identification of towns, settlements and lands where Traveller accommodation exists and where it will be required/can be improved on.

Site Selection - provide criteria for site selection at LAP stage e.g. amenities, infrastructure and Traveller-specific services.

Cultural Amenities – reflect the other cultural amenities and needs of the Traveller community e.g. stables, community facilities/resources, *and*

Design – set out design parameters and standards for halting sites, bays and required special provisions for Traveller-specific accommodation.



6.0 Good Practice Examples

The purpose of this CSP is to promote best practice exemplars. These typically arise where the local authority development plan reflects the outputs from the TAP process. It has been observed in our research that the level of detail within TAPs varies, even in the context of the suite of guidelines available to assist housing authorities, which include specific references to planning considerations and site investigations.

Notwithstanding those variances, a small number of development plans have incorporated specific proposals for the provision by the local authority of accommodation for the Traveller community.

However, our research has found that overall there is an inconsistent approach in relation to the inclusion of maps and land use zoning within development plans, specifically for Traveller accommodation, reflecting the need for improvements.

More specifically it was observed that a small number of local authorities used maps within their development plan to indicate specific locations of known Traveller accommodation projects.

Other local authorities also mapped potential land to be zoned for Traveller accommodation for future projects, the projected growth of existing Traveller accommodation projects and the proposed relocation of existing Traveller accommodation due to redevelopment.

By contrast, the requirement set out in the 2000 Act states that a development plan must include objectives for “*the provision of accommodation for travellers, and the use of particular areas for that purpose*”. While it is not stipulated in the Act that this must be provided in a map form, best practice would include the use of mapping together with an inventory list of Traveller accommodation projects.

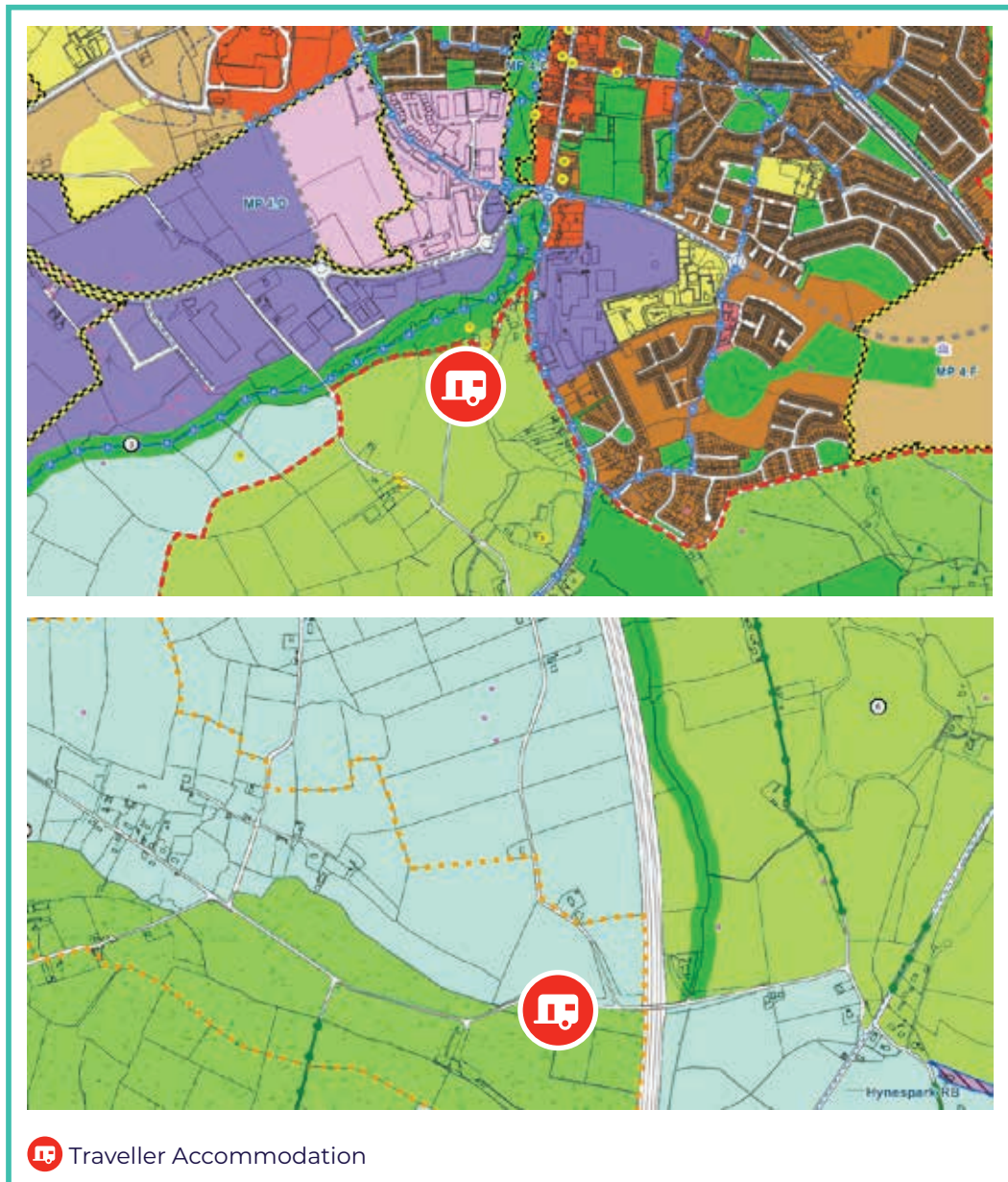
It is recommended that all local authorities should adopt the good practices set out in the examples included below and this will be examined as part of the OPR’s statutory plans evaluation process.



6.1 Development Plans with Mapping of Traveller-Specific Accommodation

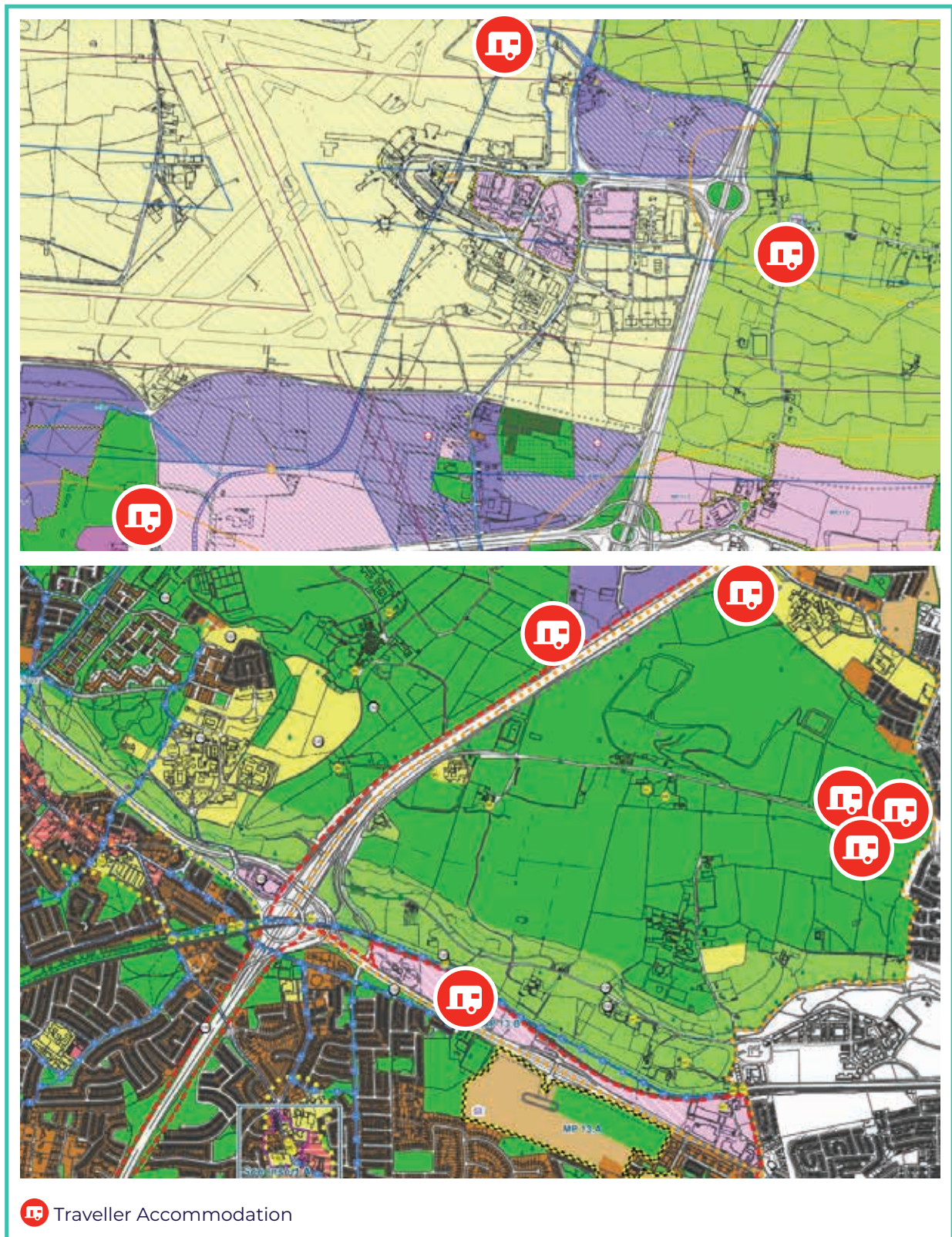
Fingal

The Fingal County Development Plan 2017-2023 is a strong example of how Traveller-specific accommodation is included within development plan maps. The following maps, illustrate examples of existing Traveller accommodation throughout Fingal. Traveller accommodation is categorised as a specialised listing within the mapping.



> Mapping of Existing Traveller Accommodation: Sheet 4 Swords, 2 sites identified.

For the purpose of this CSP the OPR has inserted enlarged icons to illustrate the location of Traveller accommodation. For precise information in relation to the locations of this accommodation please refer to the respective development plan maps of each local authority.



- > Mapping of Existing Traveller Accommodation: Sheet 11, Fingal South, three sites identified & Sheet 13, Blanchardstown South, six sites identified.

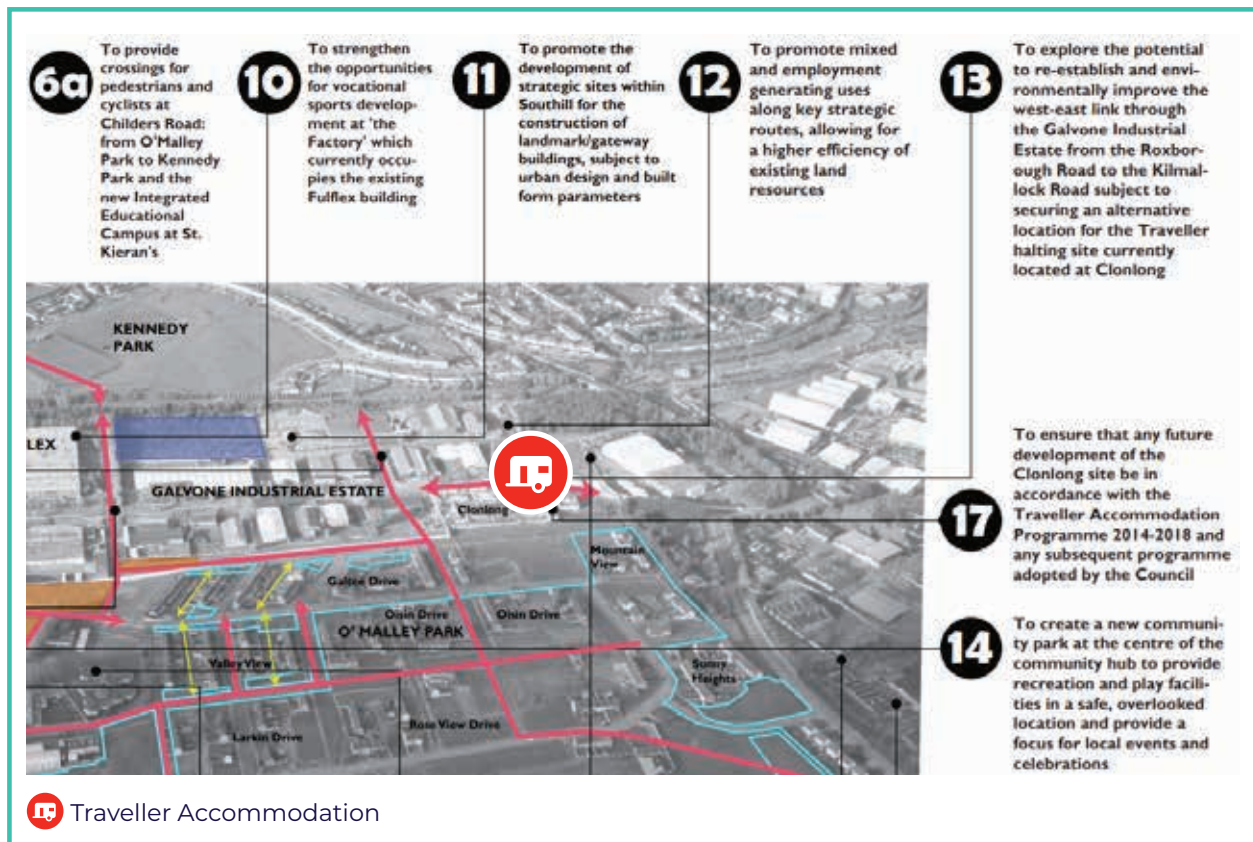
Limerick City

Limerick City Development Plan 2010-2016 includes mapping of known Traveller accommodation sites, and future locations in the context of wider regeneration initiatives. There are also good linkages between the development plan and the TAP.

For example, Traveller-specific local zoning objectives for Southill: O Malley Park and Keyes Park state the following:

“13. To explore the potential to re-establish and environmentally improve the west-east link through the Galvone Industrial Estate from the Roxborough Road to the Kilmallock Road subject to securing an alternative location for the Traveller halting site currently located at Clonlong.”

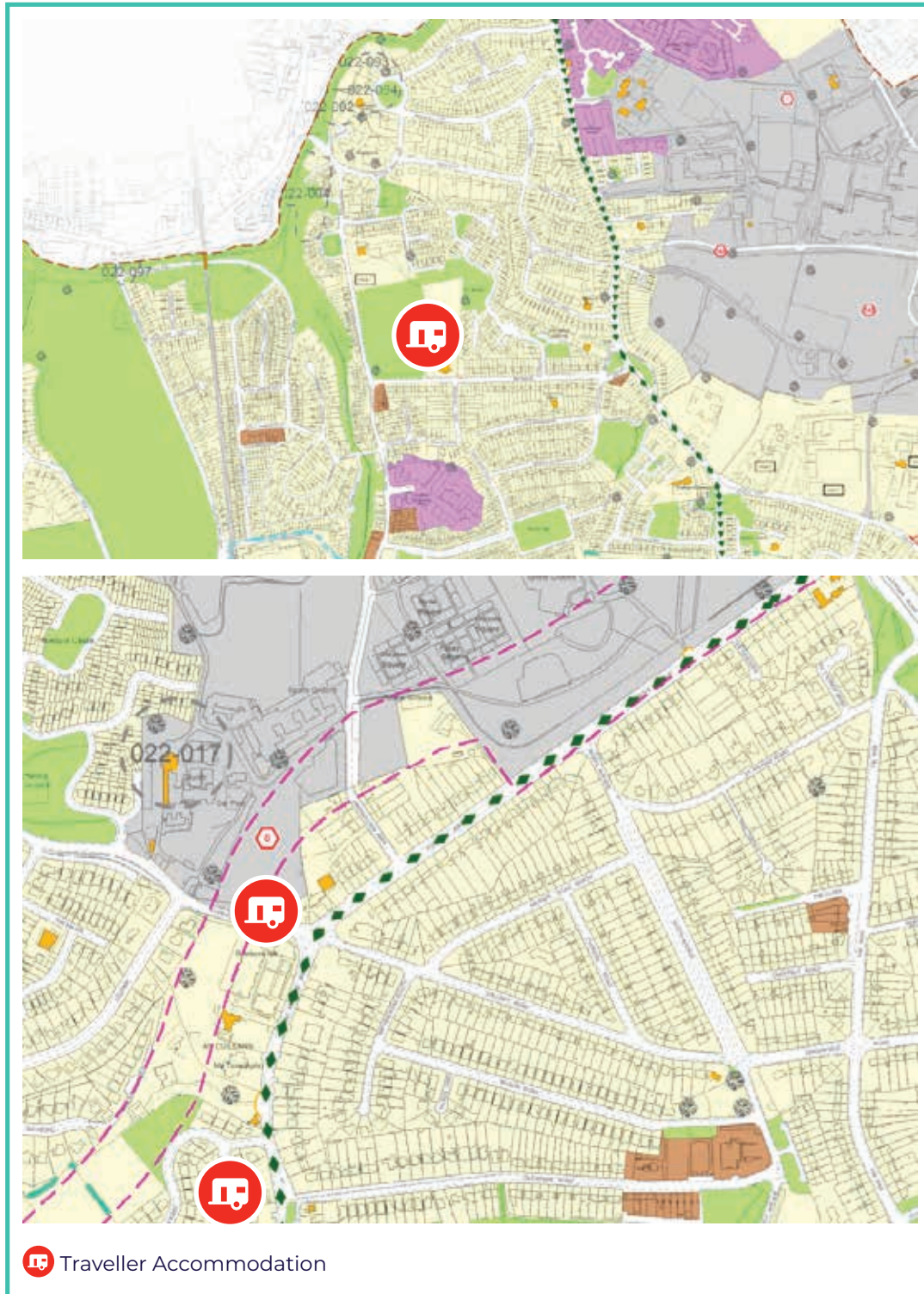
17. To ensure any future development of the Clonlong site be in accordance with the Traveller Accommodation Programme 2014-2018 and any subsequent programme adopted by the Council.”



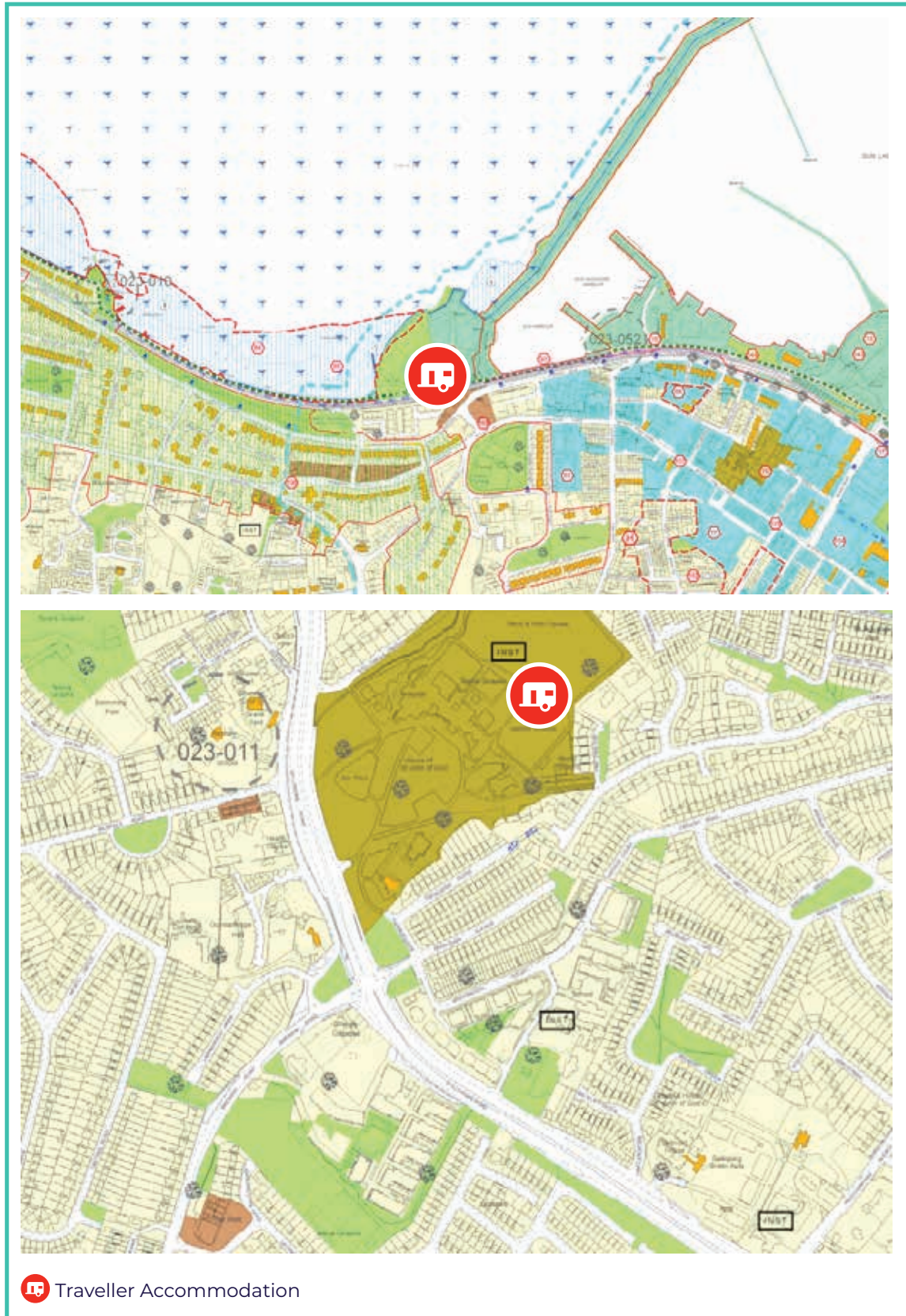
- > Mapping of Existing Traveller Accommodation and Alternative Location for an Existing Halting Site.

Dún Laoghaire-Rathdown

The Dún Laoghaire-Rathdown County Development Plan 2016-2022, includes Traveller-specific objectives within its maps.



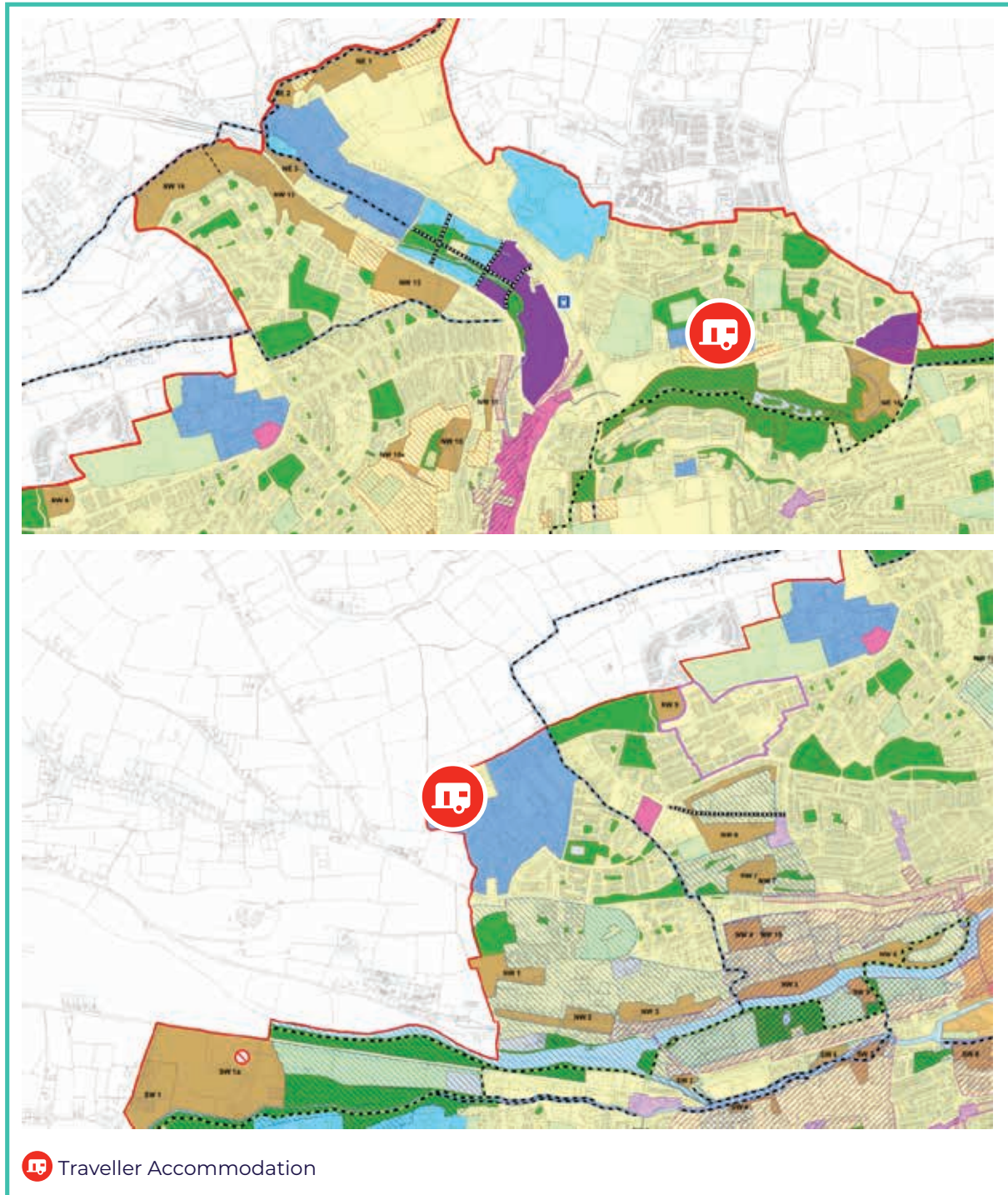
- > Mapping of Existing Traveller Accommodation: Map 1, one site identified & Map 2, two sites identified.



- > Mapping of Existing Traveller Accommodation: Map 3, one site identified & Map 6, one site identified.

Cork City

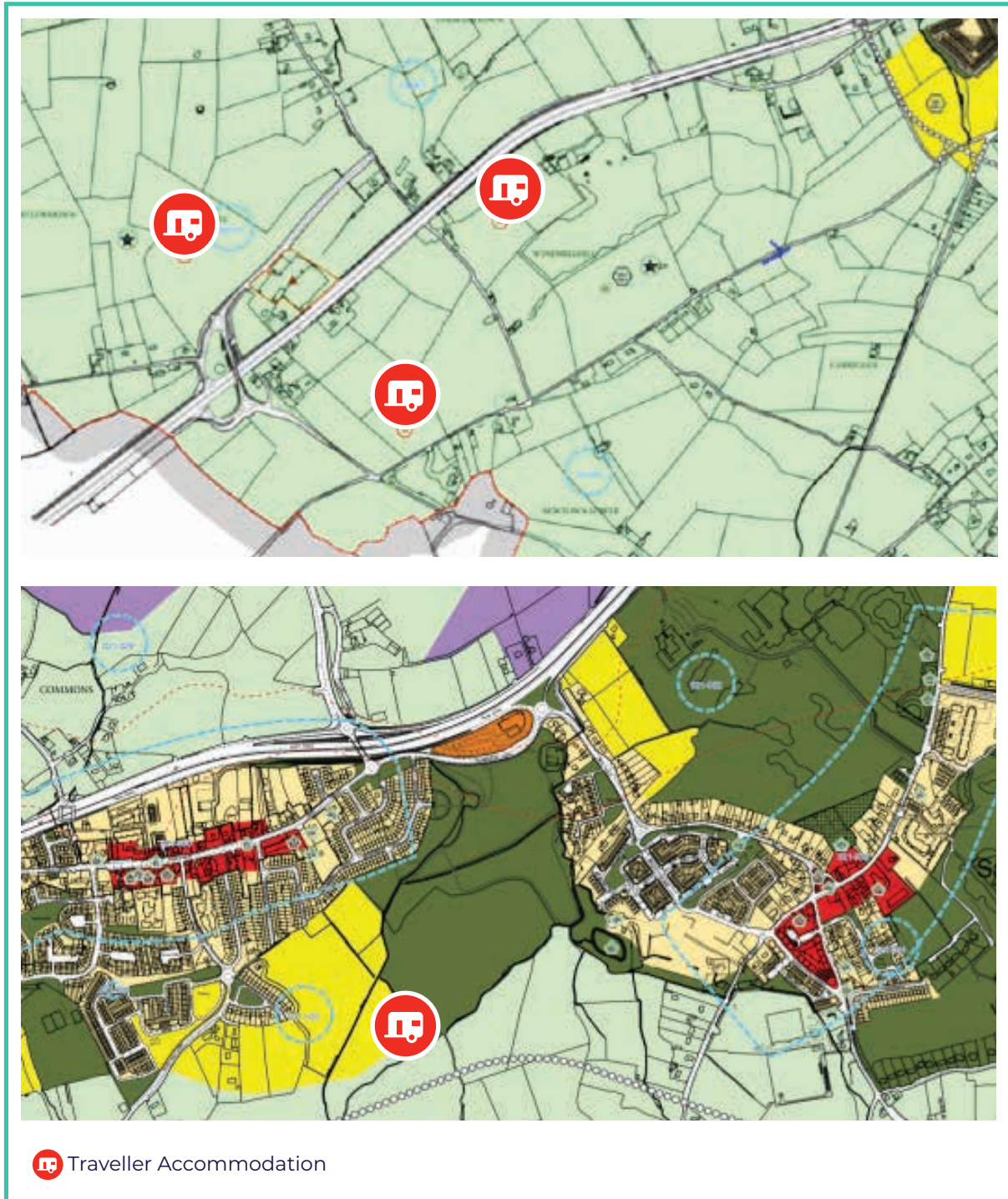
The Cork City Development Plan 2015-2021, includes mapping of known Traveller accommodation sites.



- > Mapping of Existing Traveller Accommodation: Map 4, North Central Suburbs, one site identified & Map 9, North Western Suburbs Objectives, one site identified.

South Dublin

The South Dublin County Development Plan 2016-2022, includes mapping of existing and/or permitted Traveller accommodation sites and also includes indicative locations where further sites are required.



- > Mapping of Traveller Accommodation: Map 7, three sites identified, & Map 8, 1 site identified.

7.0 Good Practice Checklist/Summary

The good practice checklist below summarises key issues that the OPR will be examining in the context of Traveller-specific accommodation requirements when assessing development plans.

Does the development plan?

- > Include objectives to ensure that the housing strategy and HNDA prioritise a satisfactory standard of suitable, sustainable accommodation that meet the specific needs of the Travelling Community.
 - > Include mapping of known and proposed Traveller accommodation.
 - > Ensure clear linkages between development plans and TAPs to ensure actionable outcomes and adequate funding to implement policy.
 - > Provide recognition of the cultural requirements of members of the Travelling community in regards to accommodation.
 - > Prioritise community integration, access to services and supporting cultural infrastructure associated with Traveller culture.
 - > Reflect from the TAP, fair and effective policies for the management of existing Traveller-specific accommodation subject to demand for accommodation from extended families, taking into account suitability of locations, health and safety considerations and the overall pattern of development in the area.
- > Have consistency in terms of the use of language and definitions used by local authorities to describe Traveller accommodation to ensure uniformity.
 - > Build upon the TAP process and demonstrate that the development plan has been appropriately guided and informed in relation to matters such as site selection and suitability, to enable the provision of adequate facilities and services for Traveller accommodation. The reflection of a properly informed and consultatively developed TAP into statutory development plans will ultimately ensure clear and agreed development plan policies and an effective and robust context for decision-making on specific accommodation proposals.



8.0 Conclusions of the Report

The conclusions of this CSP are as follows:

- 1.** There are a variety of approaches used by local authorities in addressing Section 10(2) (i) of the 2000 Act in statutory development plans:
 - (a)** Some local authorities provide a single ‘catch all’ policy to support their TAP without specifying how in detail it will likely be reflected in the development plan.
 - (b)** All local authorities offer Traveller-specific accommodation options; it is also acknowledged that some members of the Travelling community list their accommodation preference as non-Traveller-specific.
 - (c)** A small number of local authorities (5) provide a map(s) of Traveller-specific accommodation in their development plans.
 - (d)** The majority of local authorities (94%) include listed policies or objectives in relation to Traveller accommodation in their development plans.
 - (e)** Three local authorities had close alignment between the listed objectives within their development plan and TAP.
 - (f)** Although some local authorities included mapping of Traveller accommodation within their TAP, this information was not included in their development plan maps.

Although 94% of the statutory plans reviewed met their minimum or basic obligations under Section 10(2)(i) of the 2000 Act by inclusion of a Traveller-specific accommodation objective(s), the overall picture is of a mixed approach in the practice of integration between the TAP and the development plan.

The depth and breadth of analysis and information available from the TAPs is also a significant factor. Where local authorities expend strong efforts in preparing their TAP the site-specific objectives of the development plan should follow naturally, although the research found this was not always the case on the ground.

The next generation of development plans will also benefit from the HNDA evidence-based approach of the DHLGH, which represents a further opportunity to improve alignment between local authorities’ TAPs and development plans. This will require the officials of local authority Housing and Planning Departments to work closely in an integrated manner through their respective TAP and development plan processes.



2. Where local authorities follow good practice approaches described in Section 6.0 above, more progress can be made in the implementation of Traveller accommodation requirements.

Although some local authorities included mapping of Traveller accommodation within their TAP, this information was not included in their development plans. It is not clear why such plans did not include location specific objectives and maps, which would demonstrate more clearly to the general public how Traveller accommodation was addressed in the plan and obviating difficulties further down the line at Part 8 stage.

3. Following on from (2) above, having regard to the OPR's statutory function in accordance with the provisions of Section 31AM of the 2000 Act, to evaluate and assess county and city development plans, at least at a strategic level. The OPR will prioritise, in its evaluation of development

plans, working with local authorities to bring about a more consistent approach in regards to the identification of Traveller accommodation within development plans.

4. Consultative engagement through existing channels such as the Local Traveller Accommodation Consultative Committee (LTTAC), National Traveller Accommodation Consultative Committee (NTACC), CCMA, the CCMA's Housing, Building and Land Use Committee, the OPR and the DHLGH, should be pursued to enhance the effectiveness and consistency of implementing the obligation under Section 10(2)(i) of the 2000 Act. This should result in clear and measurable Traveller accommodation objectives being included in every development plan across the state. This is timely given that the HNDA process will be implemented across all local authorities in the short term.



Appendix A

Traveller-specific Listed Policies and Objectives within Development Plans (as per the Mandatory Objective requirement set out under *Section 10(2)(i) of the 2000 Act*)

Dublin City	
POLICY QH27:	To recognise the separate identity, culture, tradition and history of the Travelling people and to reduce the levels of disadvantage that Travellers experience.
POLICY QH28:	To provide a range of accommodation options for Travellers who normally reside in the Dublin City area and who wish to have such accommodation in accordance with the Dublin City Council <i>Traveller Accommodation Programme 2014 – 2018</i> and as updated during the life of the plan.
Dún Laoghaire-Rathdown	
POLICY RES11:	It is Council policy to implement the <i>Traveller Accommodation Programme 2014-2018</i> . In accordance with the Programme, halting sites, including temporary emergency halting sites and Traveller-specific group housing schemes, will be provided for the accommodation of Travellers who normally reside in the county and who are included in the most recent 'Assessment of Need' for Traveller-specific accommodation, in addition to providing standard social housing to meet their needs.
Fingal	
OBJECTIVE PM09:	Secure the implementation of Fingal County Council's <i>Traveller Accommodation Programme 2014-2018</i> and to review this programme if required and/or deemed to be necessary, during the course of the Development Plan. Sites identified on map.
South Dublin	
H5 OBJECTIVE 1:	To implement the South Dublin County Council <i>Traveller Accommodation Programme 2014-2018</i> (and any superseding programme).
H5 OBJECTIVE 2:	To ensure that Traveller accommodation is located in proximity to services, including public transport.
H5 OBJECTIVE 3:	To provide long term sustainable Traveller accommodation developments, while ensuring proper provision of infrastructure.
H5 OBJECTIVE 4:	To ensure that all Traveller accommodation is provided to the highest standard and following detailed consultation with local communities and Traveller advocacy groups.
H5 OBJECTIVE 5:	To ensure that every halting site has basic amenities such as water and ESB and are situated to enable as much integration with local communities as possible, i.e. access to schools, GPs, shops, playgrounds and sports clubs.

Kildare	
POLICY SN 4:	Implement the Draft Kildare County <i>Traveller Accommodation Programme 2014-2018</i> (and any superseding programmes agreed by the Council) in accordance with the principles of proper planning and sustainable development.
OBJECTIVE SNO 7:	Ensure that Traveller accommodation is located in proximity to key services including education, community, health, recreation and public transport facilities.
OBJECTIVE SNO 8:	Provide longer term sustainable Traveller accommodation development, while ensuring proper provision of infrastructure for all accommodation including halting sites.
Meath	
OBJECTIVE HS OBJ 3:	To provide appropriate accommodation for Travellers through the implementation of the <i>Traveller Accommodation Programme 2009 - 2013</i> and any subsequent Programme adopted during the life of this Development Plan.
Louth	
POLICY RES 9:	In seeking to provide appropriate accommodation, the Council will implement the following: – <i>Traveller Accommodation Programme 2014-2018</i> .
Laois	
POLICY HP6:	Seek to provide appropriate accommodation for Travellers through the continued implementation of the Council's <i>Traveller Accommodation Programme</i> .
Longford	
POLICY HS-15:	Regard shall be had in the assessment of new developments to the social inclusion of all sectors of society, including the needs of the Travelling community and ethnic minorities. Traveller accommodation shall be provided in accordance with the current, and any future, Traveller accommodation plan.
Offaly	
POLICY HS-05:	It is Council policy that where considering development and/or acquisition of social and Traveller-specific housing the Council will have full regard to: a) The policies contained in the County Development Plan and any other relevant action plans. b) The County's Settlement Strategy. c) The policies contained in the Councils' Social Housing Investment Programme and Traveller Accommodation Programme. d) The need for social integration. e) The need to ensure the overall coherence of the development.
POLICY HS-10:	It is Council policy to respect the distinctive culture of the Travelling community and assist in the process of integration with the settled community.
POLICY HS-11:	It is Council policy to provide a good and well-managed living environment for the Travelling community including recommended standards of accommodation, sanitary facilities, and pre-school education facilities, where feasible and on sites approved by the relevant housing authority only.
OBJECTIVE HSO-02:	It is an objective of the Council to provide adequate accommodation for Travellers in accordance with the Council's <i>Traveller Accommodation Programme</i> for County Offaly. Further it is an objective of the Council to take a flexible approach to the location of this accommodation for Travellers.

Westmeath	
POLICY P-HS5:	To secure the implementation of the Council's <i>Traveller Accommodation Programme 2014-2018</i> and to review this programme if required and/or deemed to be necessary, during the Plan period.
Carlow	
POLICY HSG 2:	Have regard to the <i>Traveller Accommodation Programme 2014 – 2018</i> and the Carlow Inter Agency Strategy for services to the Travelling community.
POLICY S. I 6:	Aim to provide services and community facilities that reflect the varying needs of ethnic minority groups so as to facilitate ease of integration into the community. Support the strategies and plans contained within ' <i>Carlow Integration Strategy</i> ' 2014 – 2018.
POLICY S. I 7:	Address the provision of accommodation appropriate to the particular needs of Travellers through the implementation of the <i>Traveller Accommodation Programme</i> .
Cavan	
POLICY HO10:	Support the implementation of the <i>Traveller Accommodation Programme</i> to ensure the provision of adequate and suitable accommodation in consultation with persons from the Travelling community, the general public, and the Local Traveller Accommodation Consultative Committee.
POLICY SCP10:	Ensure access to community infrastructure is provided for minority groups in the county.
POLICY SCP11:	Have a special focus on housing issues for the Traveller community through the <i>Traveller Accommodation Programme</i>
OBJECTIVE SCO19:	To recognise and promote the special character of the Travelling community.
OBJECTIVE SCO20:	To promote equal access to all facilities for this minority group.
OBJECTIVE SCO21:	To work on an interagency basis at strategic and operational level to deliver actions that will bring about greater equality for the Traveller community (Traveller Interagency Working Group).
Galway City	
POLICY 2.2:	Implement the <i>Traveller Accommodation Programme 2014-18</i> and any subsequent plan in the interest of providing a satisfactory standard of suitable, sustainable accommodation that meets the needs of the Travelling community. Include for engagement in this regard with Galway Traveller Movement and Local Traveller Accommodation Consultative Committee (LTACC).
POLICY 2.3:	Have regard to the <i>Traveller Accommodation Programme 2014-2018</i> and any subsequent plan in the provision of accommodation for the Travelling community. Facilitate the specific accommodation needs of Travellers through land use zoning objectives.
Galway County	
OBJECTIVE UHO 5:	Traveller Accommodation Support and implement the Draft <i>Traveller Accommodation Programme 2014-2018</i> for County Galway (or any updated/ superseding document).

Leitrim	
POLICY 39:	It is the Council's policy to support the settlement and integration of Traveller families into settled communities, in line with their expressed preferences, and to provide accommodation under the <i>Traveller Accommodation Programme</i> .
POLICY 42:	It is the policy of the Council to provide appropriate housing accommodation for the Traveller Community in accordance with the <i>Traveller Accommodation Programme 2014-2018</i> adopted by the Council and in accordance with subsequent revisions to this programme, when formally adopted by Council.
OBJECTIVE 24:	It is an objective of the Council to provide, landscape and maintain serviced halting sites (both permanent and transient) should the need arise and in accordance with the provision of the <i>Traveller Accommodation Programme</i> for the accommodation of the Travelling community.
Mayo	
OBJECTIVE AL-05:	It is an objective of the Council to take reasonable steps to secure the implementation of the <i>Traveller Accommodation Plan 2009-2013</i> and any subsequent adopted plans.
POLICY HSP 11:	To provide accommodation for all sectors of society, including the needs of the Travelling community in accordance with the current, and any future, Traveller accommodation plan, and ethnic minorities, as far as is reasonable and practicable using the full range of housing options available.
Monaghan	
POLICY HSP 11:	To provide accommodation for all sectors of society, including the needs of the Travelling community in accordance with the current, and any future, Traveller accommodation plan, and ethnic minorities, as far as is reasonable and practicable using the full range of housing options available.
Roscommon	
POLICY 5.16:	Provide for the accommodation needs of Travellers, as far as is reasonable and practicable, using the full range of housing options available to the local authorities and having regard to the policies of the <i>Traveller Accommodation Programme 2014 – 2018</i> .
POLICY 5.17:	Consult with Travellers, their representative organisations and local communities in relation to the siting, planning and design of prospective halting sites or group housing schemes and promote social inclusion. Halting sites will be subject to the detailed design standards as outlined in the Department of the Environment's Guidelines for Residential Caravan Parks for Travellers, October 1997, and normal development management standards.
POLICY 5.18:	Provide and manage halting sites in a manner compatible with the local environment and the needs of the Travelling community, based on management plans set up in co-operation with Traveller families.
OBJECTIVE 5.6:	Provide appropriate accommodation to meet the needs of Travellers including the use of particular areas for that purpose through the implementation of the <i>Traveller Accommodation Programme 2014–2018</i> and any future updates.
Sligo	
POLICY P-TA-HOU-1:	Provide accommodation for Travellers, as far as is reasonable and practicable, using the full range of housing options available and having regard to the policies outlined in the <i>Traveller Accommodation Programme 2014–2018</i> and subject to Habitats Directive assessment.
POLICY P-TA-HOU-2:	Consider the submissions of Travellers, their representative organisations and those of the local communities in relation to the siting, planning and design of prospective halting sites or group housing schemes, so as to avoid social conflict and promote social inclusion.
OBJECTIVE O-TA-HOU-1:	Provide Traveller accommodation at Collooney, Tobercurry, Cloonamahon (existing site to be redeveloped) and Ballyfree (existing site to be redeveloped).

Clare	
OBJECTIVE CDP4.9:	To provide appropriate housing accommodation for the Traveller community in accordance with the Social Housing Strategy 2020 and the Clare County Council <i>Traveller Accommodation Programme 2014-2018</i> , and any subsequent programme adopted by the Council.
Cork County	
OBJECTIVE HOU 5-2:	<p>a) Encourage the provision of permanent accommodation for Travellers subject to proper planning considerations and the principles of sustainable development, having regard to the provisions of the <i>Traveller Accommodation Programme for County Cork 2009-2013</i>.</p> <p>b) Provide permanent accommodation for the County's indigenous Traveller community and the natural increase of that community through the provision of standard houses.</p> <p>c) Provide transient accommodation through the provision of sites to address the accommodation needs of Travellers other than at their normal place of residence, having regard to annual patterns of movement.</p>
POLICY 2.6:	<p>(Principle 2: To promote a socially balanced and inclusive society in all housing areas within Cork City and County.)</p> <p>The Cork Local Authorities will seek to provide appropriate accommodation for Travellers and/or halting site and/or transient site facilities through the continued implementation of the Traveller accommodation programmes.</p>
Cork City	
OBJECTIVE 6.6	<p>Meeting Housing Needs of Special Categories:</p> <p>c) Providing suitable accommodation for Travellers; designating the use of particular areas for this purpose; and implementing <i>Traveller Accommodation Plans</i> (See Maps in Vol 2). Furthermore, accommodation for Travellers may be provided on other lands zoned for residential use.</p>
Kerry	
OBJECTIVE HS-10:	Implement the <i>Traveller Accommodation Programme 2014-2018</i> in order to provide appropriate accommodation for the Travelling community.
Kilkenny	
OBJECTIVE 5D:	Complete the review of the <i>Traveller Accommodation Programme</i> .
OBJECTIVE 5E:	To implement the Kilkenny Travellers Horse project.
OBJECTIVE 5F:	To redevelop the Wetlands halting site as a group housing scheme.
OBJECTIVE 5G:	To implement the provisions of the <i>Traveller Accommodation Programme</i> .
Limerick City	
POLICY H.16:	It is the policy of Limerick City Council to implement the 5 Year <i>Traveller's Accommodation Programme</i> to meet the needs of the local community.
Limerick County	
OBJECTIVE HOU 09:	It is the objective of the Council to provide housing accommodation for the Traveller Community in accordance with the <i>Traveller Accommodation Programme 2009-2013</i> and any subsequent programmes formally adopted by the Council.
Tipperary	
OBJECTIVE SO4-9:	It is the objective of the Council to provide accommodation for the Travelling community who, pursuant to existing housing legislation and policy and the Housing (Traveller Accommodation) Act, 1998 are considered to be in need of accommodation, in line with the North and South Tipperary County Council's <i>Traveller Accommodation Programme 2014-2018</i> (and any amendment thereof).

Waterford County	
POLICY H8:	To implement National Policy on Traveller Accommodation; Accommodation Options for Travellers, and to provide accommodation for travellers in accordance with the <i>Traveller Accommodation Programme 2009-2013</i> .
Wexford	
OBJECTIVE HP22:	To implement, insofar as possible having regard to budgetary constraints, the <i>Traveller Accommodation Programme 2007-2013</i> and any subsequently adopted strategy.
OBJECTIVE CF08:	To implement the <i>Traveller Accommodation Programme 2007-2013</i> and any subsequent Programme adopted by the Council and continue to address the provision of accommodation appropriate to the particular needs of Travellers.

Footnote:

Two development plans (Donegal and Waterford City) included extensive detail and narrative in relation to their intentions in respect of Traveller accommodation provision, but they did not include a listed policy/objective.

Appendix B

Traveller Accommodation Programmes: An Overview of the General Policies and Objectives across the Local Authorities

Dublin City	
POLICY:	<p>Policy Statement: It is Dublin City Council's policy to provide Traveller-specific accommodation for the City Council's indigenous Travelling community. For this purpose, the City Council will regard a Traveller household as indigenous where:</p> <ul style="list-style-type: none"> – The householder has been resident within the City Council's administrative area for any continuous five-year period that an accommodation applicant was previously a tenant of, or resident, in the City Council's administrative area, <p style="text-align: center;"><i>or</i></p> <ul style="list-style-type: none"> – The householder has been resident within the City Council's administrative area for at least three years prior to the adoption of the City Council's <i>Traveller Accommodation Programme 2019-2024</i>, i.e. since 2016.
POLICY:	<p>Policy Statement: It is Dublin City Council's policy to provide choice in both housing tenure and location insofar as is possible. It is also Dublin City Council's intention to ensure choice is available to Travellers through greater geographic diversity within the wider City Council area. This would then reduce the reliance on clustering in specific areas through the consideration of alternative locations to accommodate Traveller applicants on the current waiting list.</p>
OBJECTIVE:	<p>Appendix 1: The overall objective of Dublin City's LTACC will be to ensure that the <i>Traveller Accommodation Programme</i> is implemented.</p>
Dún Laoghaire-Rathdown	
POLICY:	<p>Policy Statement: It is Dún Laoghaire-Rathdown County Council's policy to provide Traveller-specific accommodation for the county's indigenous Traveller community. For the purpose of this Programme, the Council regards a Traveller household as 'indigenous' where the household has been permanently resident in the county for at least three years immediately prior to the adoption of Dún Laoghaire-Rathdown County Council's <i>Traveller Accommodation Programme 2019-2024</i>. The Council will also assist Travellers with their housing applications who want to avail of standard housing and HAP.</p>
POLICY:	<p>Management and Maintenance: It is the Council's policy to ensure that all halting sites and grouped housing schemes will be managed and maintained to a high standard. The Council will continue with its programme of work to improve the standard of existing permanent Traveller-specific accommodation and where necessary the upgrading of such accommodation.</p>
POLICY:	<p>Anti- Social Behaviour: It is Council policy that anti-social behaviour will not be acceptable in any Council Traveller-specific or standard housing accommodation and will be dealt with in accordance with the Council's Strategy in Dealing with Anti-social Behaviour 2016-2021.</p>

Fingal	
POLICY:	Policy Statement: It is the policy of the Council to provide group and standard housing options as well as residential caravan park bays, for the accommodation of Travellers who are indigenous to the administrative county of Fingal in accordance with the assessment of need carried out under the provisions of the Housing (Traveller Accommodation) Act 1998.
POLICY:	Indigenous Policy: It is Fingal County Council's policy to provide Traveller-specific accommodation only for the county's indigenous Travelling community. For the purpose of this programme, the Council will only regard a Traveller household as 'indigenous' where the household has been permanently resident in the county for not less than three years immediately prior to the adoption of Fingal County Council's <i>Traveller Accommodation Programme 2014 – 2018</i> .
POLICY:	Anti-Social Behaviour: It is Council policy that anti-social behaviour will not be tolerated in any Council, Traveller-specific or standard housing accommodation.
OBJECTIVE:	Background and Legal Basis: i) To implement the provision of the Local Government (Planning and Development) Act, 2000, to ensure that county and urban development plans specifically include objectives concerning the provision of Traveller accommodation.
OBJECTIVE:	Proposed New Programme of Revision: Howth Road: Howth Road The provision of a 5 unit group housing scheme as part of an integrated housing project remains an objective of the Council.
South Dublin	
POLICY:	Policy Statement: It is our policy to provide Traveller-specific accommodation for the County's indigenous Travelling community, i.e. those families who have been permanently resident in the county for three years prior to the adaptation of South Dublin County Council's <i>Traveller Accommodation Programme 2019-2024</i> .
POLICY:	Management and Maintenance of Developments: It is the Council's policy to ensure that all halting sites and group housing schemes will be managed and maintained to a high standard.
POLICY:	Anti-Social Behaviour: It is Council policy that anti-social behaviour will not be acceptable in any Traveller-specific or standard social housing and will be dealt with in accordance with the Council's Anti- Social Behaviour Strategy.
OBJECTIVE:	The adequate provision of accessible, suitable and culturally appropriate accommodation available for Travellers.
OBJECTIVE:	The delivery of Traveller accommodation is underpinned by a robust monitoring and evaluation framework.
OBJECTIVE:	Ensure that the budget allocated for Traveller-specific accommodation is used fully and appropriately.
Kildare*	
POLICY:	Policy Statement: It is the policy of the Council to provide high quality accommodation based on the distinct needs and the family circumstances of Travellers which will be accommodated in so far as is possible. This accommodation will include general housing, group housing, halting site accommodation, temporary sites and appropriate emergency accommodation where appropriate.
Wicklow	
POLICY:	Policy Statement: It is the policy of Wicklow County Council, within the resources available, to provide group and standard housing options as well as halting sites for the accommodation of Travellers who are on the list for Social Housing Support with Wicklow County Council, in accordance with the Assessment of Need carried out under the Traveller Accommodation Act.
OBJECTIVE:	Overview: Major refurbishment and upgrade of Silverbridge Halting Site.

Meath	
POLICY:	Policy Statement: It is the policy of Meath County Council to provide a high standard of living accommodation, which will be based on the distinct needs of Travellers which will be accommodated, in so far as possible.
OBJECTIVE:	Policy Statement: It is the objective of Meath County Council to provide accommodation for Travellers that formed part of the assessment process detailed earlier, within the lifetime of the Programme.
OBJECTIVE:	Strategy and Implementation Statement: It is the objective of Meath County Council to ensure that practical and appropriate fire safety measures are applied in order to contribute to preventing loss of life and serious injury in Local Authority Traveller accommodation. Accordingly, fire safety in Traveller accommodation will remain a set Agenda item for the quarterly meetings of the Local Traveller Accommodation Consultative Committee.
Louth	
POLICY:	Policy Statement: It is the policy of the local authority, within the resources available, to directly provide accommodation to Travellers in accordance with the Housing (Traveller Accommodation) Act 1998.
Laois	
POLICY:	Policy Statement: It is the policy of the local authority, within the resources available, to directly provide accommodation to Travellers in accordance with the Housing (Traveller Accommodation) Act 1998.
Longford	
POLICY:	Policy Statement: It is the policy of Longford County Council to provide a high standard of living accommodation, which will be based upon the distinct needs of Travellers, which will be accommodated in so far as possible.
POLICY:	Halting Site Accommodation: It is the policy of Longford County Council to provide Traveller-specific accommodation for Travellers on permanent halting sites, if so requested by Travellers themselves. Currently there are two families living in Willow Park.
Offaly*	
POLICY:	Provision of Accommodation: It is the policy of the Council to consult with Traveller applicants regarding their accommodation needs and requirements to provide, where appropriate, Traveller-specific accommodation.
POLICY:	The policy also covers tenants of halting sites and Group Housing Schemes.
POLICY:	Horses: The policy proposes in line with the Offaly County Council Control of Horse Bye-Laws 2014 which state: <ul style="list-style-type: none"> – that the owners of horses seized by Offaly County Council must comply with the following requirements when reclaiming their animals. – Evidence of identity of person claiming horse/s – Driver’s License/Passport, etc. – Proof of ownership of horse – Valid Horse Passport. – Payment of all fees in respect of the detention of the horse. – Proof of availability of sufficient lands to keep horses (land deed, lease agreement). – Evidence of registration of Equine Premises under Diseases of Animals Act 1966.

Westmeath	
POLICY:	Policy Statement: It is the policy of Westmeath County Council to provide a high standard of living accommodation, which will be based upon the distinct needs of Travellers, which will be accommodated in so far as possible.
Carlow	
POLICY:	Policy Statement: It is the policy of Carlow County Council to provide sustainable, quality social affordable and cost-effective housing to meet current and future accommodation need. Within available resources, it is Carlow County Council's policy to provide group and standard housing options as well as halting sites, temporary/emergency accommodation and single instance houses for the accommodation of Traveller households who are indigenous to County Carlow, in accordance with the Assessment of Need carried out under the Traveller Accommodation Act. Such options are, where feasible, provided in recognition of the need for Traveller-specific accommodation by some households.
POLICY:	Proposed Accommodation: Carlow County Council will endeavour to meet these requirements over the period of the programme. The policy of offering one in ten vacancies to traveller families will continue where appropriate.
Cavan	
POLICY:	Policy Statement: It is the policy of Cavan County Council to provide suitable accommodation for Traveller households in its administrative area, in accordance with the Assessment of Need carried out under the Act, in consultation with the Travelling community, Traveller's Organisations, the Local Traveller Accommodation Consultative Committee, Public Representatives, the wider community and other Statutory and Voluntary Bodies.
POLICY:	Provision of Accommodation: It is the policy of the Council to have meaningful consultation, based on DHPLG Guidelines, with Travellers and their representatives, about their accommodation needs, and to provide, where appropriate, Traveller-specific accommodation.
Donegal	
POLICY:	Implementation of Strategy: The Council's policy of considering qualifying Traveller households in the allocation of local authority's tenancies will continue in accordance with Donegal County Council's Allocation Scheme.
POLICY:	Policy Statement: The policy of Donegal County Council will be to provide suitable accommodation for Traveller families in its administrative area, in consultation with Travellers, Donegal Travellers Project, Local Traveller Accommodation Consultative Committee, Public Representatives, the wider community and other statutory & voluntary bodies.
POLICY:	Policy Statement: It will be the policy of Donegal County Council, within the resources available, to directly provide accommodation to Travellers in accordance with the Housing (Traveller Accommodation) Act, 1998.
POLICY:	Policy Statement: Donegal County Council will promote: anti-discrimination policies to ensure that Traveller tenants are not excluded, purely because they are Travellers.
POLICY:	Policy Statement: It is the Council's policy to implement its Illegal Encampment Strategy to deal with the removal of temporary dwellings where and when appropriate (any tent, caravan, mobile home, vehicle, other structure or thing, which is capable of being moved from one place to another and is or was used for human habitation).
OBJECTIVE:	Assessment of Accommodation Needs: Continue with Phase 2 works at the Big Isle Halting Site. Review Phase 3 works.
OBJECTIVE:	Assessment of Accommodation Needs: Prioritise, progress and deliver Traveller-specific accommodation project at Cashel, Ardara.

OBJECTIVE:	Assessment of Accommodation Needs: Continue with the progression of small scale projects for Traveller families on a case by case basis where emergency need arises during the course of the Programme i.e. adaptation works, remedial works, refurbishment programmes, level access showers, stair lifts etc.
OBJECTIVE:	Assessment of Accommodation Needs: Provide 58 units of accommodation through a range of Social Housing measures. Projected provision over five year period: 2019 – 10 2022 - 10 2020 – 8 2023 - 10 2021 – 12 2024 – 8.
OBJECTIVE:	Assessment of Accommodation Needs: Prioritise Canal Road Group Housing scheme with a view to dealing with ongoing illegal encampment issues affecting the scheme. Encourage positive family relations through range of measures and establish tenant participation programme at the scheme.
OBJECTIVE:	Transient Accommodation: The <i>Traveller Accommodation Programme 2014 – 2018</i> included as a specific objective of the Programme undertaking to complete an overall review of the position in terms of Transient accommodation.
Galway County	
POLICY:	Policy Statement: The policy statement sets out Galway City Councils policy in relation to: <ul style="list-style-type: none"> – The position in relating to meeting the distinct needs and family circumstances of Travellers, and unauthorised encampments.
Galway City	
POLICY:	Policy Statement: The policy statement sets out Galway City Councils policy in relation to: <ul style="list-style-type: none"> – The provision of permanent, emergency, temporary or transient accommodation, including traditional halting sites and visitor facilities at permanent accommodation. – The provision of support for those waiting for accommodation. – The position in relating to meeting the distinct needs and family circumstances of Travellers, and unauthorised encampments.
Leitrim	
POLICY:	Policy Overview: It is the policy of Leitrim County Council to adopt an inter-agency approach in the provision of services and accommodation to Travellers.
POLICY:	Inter-Agency Approach: It is the policy of the Council to have meaningful consultation based on Department of the Environment, Community & Local Government Guidelines with Travellers about their accommodation needs and to provide, where appropriate, Traveller-specific accommodation.
OBJECTIVE:	Objective and Targets: Completion of House Refurbishment, Tawlaughtmore Mohill.
OBJECTIVE:	Enhancement of Shannonside View Traveller Group Housing Scheme, Rosebank, Carrick-on-Shannon.
OBJECTIVE:	Continued Fire Safety enhancements at Shannonside View Halting Site.
OBJECTIVE:	Provide 25 units of accommodation over five year period under TAP 2019-2024.
OBJECTIVE:	Continued tenancy sustainment/support through annual maintenance programme and close administrative involvement of Traveller Liaison Officer.
OBJECTIVE:	Continued progress on projects arising throughout the course of the new TAP 2019-2024 eg, Disability works, refurbishment works, remedial works etc.

Mayo	
POLICY:	General Policy: It is the Policy of Mayo County Council to provide for the accommodation needs of Travellers, as far as is reasonable and feasible, using the full range of housing options available to the Council.
POLICY:	Accommodation: Mayo County Council's Policy in relation to the accommodation matters is as follows: The Council recognises and will have regard to the distinct cultural identity of Travellers in the provision, maintenance and management of accommodation for the Traveller community.
POLICY:	Allocation: In relation to achieving good estate management and achieving a social mix, the Council will, In keeping with the wishes of the vast majority of Traveller families, avoid an overconcentration of Traveller families in any one housing estate. It is considered by the Council that a reasonable balance in this regard currently exists within social housing estates in the County. It will be the policy of the Council to ensure that this balance is maintained.
POLICY:	The Council will have regard to the specific housing needs of Travellers in the design of Social Housing Schemes in as far as is practicable.
POLICY:	Horses: It is recognised that the keeping of horses is a tradition, which continues to be practiced by some Traveller families. Such families will be required to make their own arrangements for the acquisition of land for grazing purposes and be prepared to pay for the rent or purchase of this land.
POLICY:	Management of Accommodation: Mayo County Council will encourage and facilitate the participation of Travellers in the management and maintenance of Traveller-specific accommodation. The Council will have regard to models of good practice in the maintenance and management of Traveller accommodation to inform this initiative.
Monaghan	
POLICY	<p>Policy Statement: It is the policy of Monaghan Local Authority, within the resources available to them, to provide suitable accommodation for the following category of Travellers:</p> <ul style="list-style-type: none"> A. Travellers identified in the Assessment of Housing Needs carried out in June 2019, as needing accommodation or included in any future assessment of needs carried out during the lifetime of this programme. B. Travellers who have applied for accommodation since the Assessment of Housing Needs 2019. C. New households formed during the period of this plan comprising family members of the households at (A) and (B) above. D. New Traveller families who move into County Monaghan during the period of this plan and who satisfy Monaghan Local Authorities that they qualify for and demonstrate that they have a genuine need to be accommodated in the area.
Roscommon	
POLICY:	Policy Statement: Provision of Accommodation: Permanent accommodation will be provided on the basis of need and in accordance with the applicant's preference. Permanent accommodation options include standard social housing options and Traveller-specific options.
POLICY:	Provision of Accommodation: Transient Accommodation: Transient caravan bays (for short-term, occasional use) are provided within most Traveller-specific sites to accommodate transient visitors.
POLICY:	Provision of Accommodation: Meeting the distinct needs of Travellers: To the extent they can be identified and agreed, the distinct accommodation needs of Travellers have and will be incorporated into the <i>Traveller Accommodation Programme</i> .
POLICY:	Provision of Accommodation: Unauthorised Encampments: RCC will continue to use the powers under the Roads and Housing Legislation to move and/or relocate illegally parked caravans or other forms of temporary accommodation from the public road as they are a hazard to the illegal occupants and road users alike. Other forms of illegal parking will be assessed on a case by case basis.

Sligo	
POLICY:	Policy: It is the policy of Sligo County Council to: Provide for the accommodation needs of Travellers, as far as is reasonable and practicable, using the full range of housing options available to Sligo County Council and having regard to the <i>Traveller Accommodation Programme</i> .
POLICY:	Policy: Provide and manage halting sites in a manner compatible with the local environment and the needs of the Traveller community, based on management plans set up in co-operation with Traveller families. Good management of sites however relies in the first instance on the residents and their behaviour.
POLICY:	Policy: Deal with unauthorised encampments in accordance with the requirements of the relevant legislation, as appropriate. Each case will be dealt with on its own merits.
POLICY:	Inter-Agency Approach: It is the policy of Sligo County Council to work on an inter-agency basis, where possible, in the provision of accommodation to Travellers.
Clare*	
POLICY:	Policy Statement: Clare County Council recognises the specific requirements of providing accommodation for the Traveller community. It also recognises its role in empowering and facilitating the Traveller community so that it can provide for its own accommodation to a greater degree
POLICY:	Provision of Accommodation: It is the policy of Clare County Council to provide suitable accommodation for Traveller households in its administrative area, in accordance with the Assessment of Need carried out under the Act, in compliance with the laws of the State.
POLICY:	Provision of Accommodation: It is the Council's policy to provide non-transient Traveller-specific accommodation only for the county's indigenous travelling community. For this purpose the Council will regard a Traveller household as indigenous where the household has been permanently resident in the county for at least three years. All other housing options are available to the Travelling community.
POLICY:	Provision of Accommodation: It is the Council's policy to consult with Travellers and their representatives, based on Department of the Environment, Community & Local Government Guidelines, about their accommodation needs, and to provide, based on need, where appropriate, Traveller-specific accommodation.
POLICY:	Provision of Accommodation: It is the Council's policy that, where feasible, the preferred option in terms of accommodation type requested will be considered. If this is not feasible other accommodation options may be offered to individual households. If this reasonable accommodation offer is refused, without good reason, their housing application may be given reduced priority in line with statutory provisions.
POLICY:	Provision of Accommodation: It is the Council's policy that, Traveller families will only be considered for single instance housing in exceptional circumstances - Priority 1 medical need as determined by the HSE or in situations where other forms of Traveller-specific or standard accommodation have proven particularly unsuitable.
POLICY:	Provision of Accommodation: It is the policy of the Council that Travellers themselves must take primary responsibility for their economic activities including horse husbandry and care. Persons who own horses are obliged to comply with the requirements of the Control of Horses Act, 1996 and Local Government Bye-Laws 1998 and 2013.
POLICY:	Provision of Accommodation: It is the Council's policy to levy charges on tenants/ occupants of Traveller Accommodation facilities. The scale of charges to be levied will be reviewed on an annual basis in conjunction with the Council's Differential Rent Scheme.

Cork County	
POLICY:	Policy Statement: It is Cork County Council's policy to directly provide and assist approved housing bodies in the provision of Traveller-specific accommodation for the County's indigenous Travelling Community where possible.
Cork City	
POLICY:	Policy Statement: It is the policy of Cork City Council to provide Traveller-specific accommodation, standard housing and access to voluntary & private rented sector accommodation to meet the accommodation needs of Travellers living in the Cork City Council administrative boundary. This is in accordance with the assessment of need carried out under the provision of the Housing (Traveller Accommodation) Act 1998.
Kerry	
POLICY:	Transient Sites: It shall be the policy of Kerry County Council that any consideration to be given to the provision of sustainable Transient Sites will be done in full consultation with other Local Authorities on a regional basis.
POLICY:	Policy Statement: It is the policy of Kerry County Council to provide suitable accommodation for Traveller households in its administrative area, in accordance with the Assessment of Need carried out under The Housing (Traveller Accommodation) Act, 1998.
POLICY:	Ongoing Consultation: It is the Council's policy to consult on an ongoing basis with Travellers and their representatives, in particular, the Local Traveller Consultative Committee, based on DHPLG Guidelines, about their accommodation needs, and to provide, based on demand, where appropriate, Traveller-specific accommodation.
OBJECTIVE:	It will be an objective of the plan to facilitate the implementation of the <i>Traveller Accommodation Programme 2019-2024</i> .
Kilkenny	
POLICY:	Policy Statement: It is the policy of Kilkenny County Council to provide appropriate accommodation for Traveller families who request it, and who, pursuant to the Housing (Traveller Accommodation) Act 1998 and generic housing legislation are considered to be in need of accommodation.
POLICY:	Policy Statement: It is the policy of the Housing Authority that Travellers themselves must take primary responsibility for their economic activities including horse husbandry and care where it is possible and feasible to do so. Consideration will be given to supporting Travellers in the pursuit of legitimate economic activities.
POLICY:	Policy Statement: It is the policy of the Housing Authority to adopt an inter-agency approach in the delivery of Traveller services. New accommodation provision and/or support services will be provided as part of the inter-agency strategic approach to service delivery.
Limerick City/County	
POLICY:	Policy: It is the policy of the Council to assist Travellers who are assessed as having an accommodation need with accommodation that will address their need.
POLICY:	Policy: It is the policy of the Council that priority will be given to the provision of permanent accommodation and that the provision of sites with limited facilities as defined in Section 29 Housing (Traveller Accommodation) Act will be considered only in exceptional circumstances as determined by the Council.
POLICY:	Policy: It is the policy of the Council that Travellers themselves must take primary responsibility for their economic activities including horse husbandry and care. Where it is possible and feasible to do so consideration will be given to supporting Travellers in the pursuit of legitimate economic activities.
POLICY:	Policy: It is the policy of the Council to adopt an inter-agency approach in the delivery of Traveller services. New accommodation provision and/or support services will be provided as part of the inter-agency strategic approach to service delivery.

Tipperary	
POLICY	Policy Statement: The <i>Traveller Accommodation Programme</i> outlines the accommodation requirements of the Travelling Community over a five year period from 2019 to 2024. This policy and its implementation underline the commitment of the County Council to meet the housing needs of members of the Travelling community throughout the county.
POLICY:	Policy Statement: It is the policy of Tipperary County Council to provide appropriate accommodation for Traveller families who apply, and who, pursuant to generic housing legislation and the Housing (Traveller Accommodation) Act, 1998 are considered to be in need of accommodation.
POLICY:	Policy Statement: It is the policy of the County Council to adopt an inter-agency approach in the delivery of Traveller services. New accommodation provision and/or support services will be provided as part of the interagency strategic approach to service delivery.
Waterford City/County	
POLICY:	Policy Statement: It is the policy of Waterford City and County Council to endeavour to provide accommodation appropriate to the needs of Traveller households who live in the area, who are approved applicants for accommodation by the Council and who are included in the assessment of need in the preparation of this programme.
OBJECTIVE:	Management and Maintenance of Traveller-specific Accommodation: It is an objective of this Programme to reduce costs of ongoing Management and Maintenance of Traveller-specific accommodation while maintaining acceptable standards.
Wexford	
POLICY:	Policy Statement: It is the policy of Wexford County Council to provide accommodation appropriate to the needs of Traveller households who are approved applicants for accommodation by WCC.
POLICY:	Traveller-specific Accommodation: It is the policy and practice of WCC to provide Traveller-specific accommodation in accordance with the assessment of need and subject to feasibility.
POLICY:	Fire Safety: It is the policy of Wexford County Council to maintain appropriate fire safety standards at all Local Authority housing units which includes Traveller-specific accommodation.

*Kildare includes two listed objectives in their development plan from their TAP.

*Offaly includes the listed policies and objectives in their development plan from their TAP.

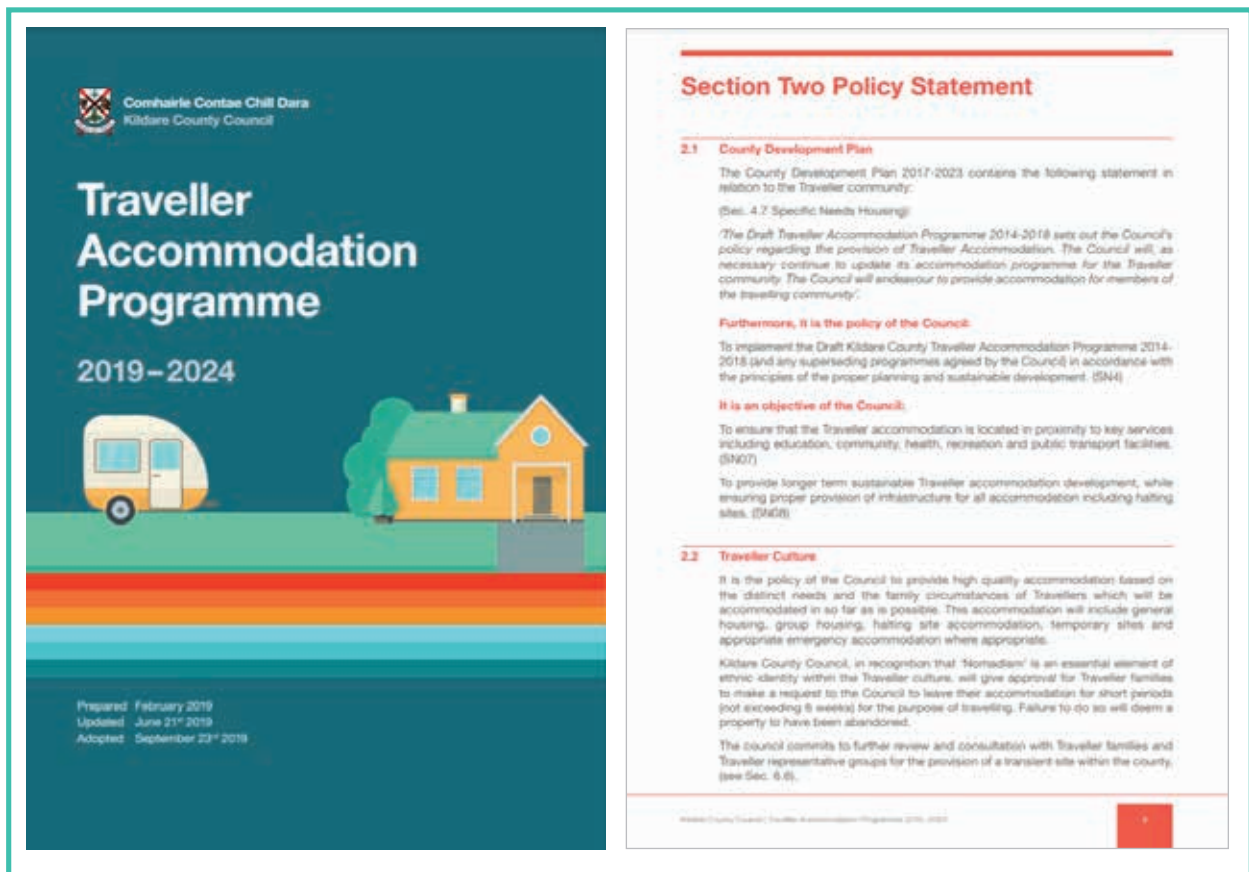
*Clare included the listed objective in their development plan from their TAP.

Fingal, Wicklow, Donegal and Leitrim include a list of existing Traveller accommodation within their TAP.

Appendix C

Traveller Accommodation Programme Sample

Kildare County Council's TAP 2019-2024 is a strong example of a linked development plan to the TAP. Listed objectives from the development plan are included within their TAP. The criteria their 'Assessment of Needs' for members of the Travelling community were based on is clearly outlined in the TAP. Definitions of the different types of Traveller accommodation were broken down into subcategories such as: permanent and transient halting sites. These are listed accordingly, to allow figures for each accommodation type to be easily identified.



Appendix D

Summary Table of Local Authorities Development Plans and Traveller Accommodation Programmes with reference to Traveller-specific Accommodation

Local Authority	Traveller-specific listed policy/objective in DP	TA mapped in DP	Traveller-specific general policy/objective in TAP	TA mapped in TAP
EMRA				
Dublin City	✓	x	✓	✓
Dún Laoghaire-Rathdown	✓	✓	✓	✓
Fingal	✓	✓	✓	✓
Kildare	✓	x	✓	x
Laois	✓	x	✓	x
Longford	✓	x	✓	x
Louth	✓	x	✓	x
Meath	✓	x	✓	x
Offaly	✓	x	✓	x
South Dublin	✓	✓	✓	✓
Westmeath	✓	x	✓	x
Wicklow	✓	x	✓	x
NWRA				
Cavan	✓	x	✓	x
Donegal	x*	x	✓	x
Galway City	✓	x	✓	x
Galway County	✓	x	✓	x
Leitrim	✓	x	✓	x
Mayo	✓	x	✓	x
Monaghan	✓	x	✓	x
Roscommon	✓	x	✓	x
Sligo	✓	x	✓	x
SRA				
Carlow	✓	x	✓	x
Clare	✓	x	✓	x
Cork City	✓	✓	✓	x
Cork County	✓	x	✓	x
Kerry	✓	x	✓	x
Kilkenny	✓	x	✓	x
Limerick City	✓	✓	✓	x
Limerick	✓	x	✓	x
Tipperary	✓	x	✓	x
Waterford City	x*	x	✓	x
Waterford	✓	x	✓	x
Wexford	✓	x	✓	✓

*Donegal and Waterford City did not include a specific listed objective within their CDP, however there was considerable discussion and narrative in relation to how they intend to meet their Traveller accommodation needs. For further details see:

Donegal County Development Plan (2018-2024) & Waterford City Development Plan (2013-2019).

Donegal/italic denotes Limerick City and County, and Waterford City and County, both have a single TAP reflective of their respective amalgamations following local government reorganisation in 2014. Both local authorities currently have separate development plans for the city and county areas. These development plans are being reviewed and new development plans will be adopted which provide for the amalgamation of the city and county councils so there will be one development plan for Waterford City and County Council and one for Limerick City and County Council in the future.

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The OPR would like to thank Donegal County Council and Sligo County Council for consenting to the use of their imagery in this publication.

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