

Submission to the Department of the Environment

Planning Policy Statement 12: Housing in Settlements  
Draft Policy HS 3 (Amended) – Travellers Accommodation

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## **Introduction**

### **The Institute of Public Health in Ireland**

The remit of the Institute of Public Health in Ireland (IPH) is to promote cooperation for public health between Northern Ireland and the Republic of Ireland in the areas of research and information, capacity building and policy advice. Our approach is to support Departments of Health and their agencies in both jurisdictions, and maximise the benefits of all-island cooperation to achieve practical benefits for people in Northern Ireland and the Republic of Ireland.

It is well recognised that Travellers have distinctive needs particularly in relation to housing. IPH has been involved in a number of health impact assessments (HIA) undertaken on Travellers accommodation sites and this work forms the basis for this response. HIA is a methodology that considers the potential effect of a proposal on the health of an identified population and makes recommendations to enhance the proposal in favour of health<sup>1</sup>. IPH welcome the opportunity to respond to the Department of the Environment (DoE), Planning Policy 12: Housing in Settlements, Draft Policy HS 3 (Amended) – Travellers Accommodation, which lays out planning permission requirements for granting Travellers specific accommodation.

### **Key points**

- Travellers health status is significantly poorer than their settled peers.
- The provision of adequate Traveller accommodation is a major issue.
- There is an inextricable link between poor housing and Travellers health outcomes.
- Adopting the toolkit to assess conditions on Travellers sites can support planners to consider the health impacts of their decisions.

Findings from the All Ireland Traveller Health Study (2010) showed that Travellers health status is significantly poorer than their settled peers<sup>2</sup>. Life expectancy for men is on average 15 years less than men in the general population. For female members of the travelling community the average is 11.5 years less than women in the general population. Lack of appropriate accommodation has been cited as one of three main factors contributing to the poor health of Travellers<sup>3</sup>.

This policy does not explicitly lay out specific guidance in relation to what is ‘adequate’ or ‘where appropriate’. Research has shown that appropriate amenities, rather than the type of accommodation are the important factors for Travellers sites<sup>4</sup>. Exposure to physical hazards in poor quality accommodation impact on mental health and wellbeing due to living in stressful situations. There should be a clear commitment to minimise the exposure of Travellers to environmental health hazards associated with the location, type or quality of their accommodation. These environmental hazards would include poor quality drinking water, inappropriate waste and sewerage systems, unsafe or

inappropriate home heating systems leading to energy inefficient housing that would exacerbate fuel poverty and lead to cold homes. Proximity to hazards for children also should be considered including non-barrier roadways, poor electrical wiring or lack of appropriate play areas proximity to local amenities such as public transport and shops.

Without specific planning guidance, problems could arise at the implementation stage leading to issues raised above.

A HIA undertaken on the Doneraile Traveller Accommodation site, Cork<sup>5</sup> recommended the following to be included when developing a halting site:

- accommodation of parking for extended family
- balance between a need to accommodate vehicles associated with Traveller work practices and home life requirements
- inclusion of piped fresh water, electricity and connection to sewage system

For a transient site it was recommended:

- provision of fresh piped mains water supply for each bay, shower facilities, toilets for each bay and electric connection for each bay.

These recommendations present key areas which are deemed a minimum requirement in the development of any Traveller accommodation site.

The recent All Ireland Traveller Health Study identified that the majority of Travellers live in houses by choice and it is the adequacy and location of that accommodation that is important, not its type. This policy identifies the potential for grouped housing schemes however it is recognised that there may be occasions when the identification of other acceptable sites away from identified settlements will be required. Being housed in an area isolated from family and friends can be very difficult for Travellers which can lead to social isolation and impact on mental health<sup>6</sup>. IPH recommend a period of engagement and consultation is undertaken with proposed residents to avoid specific groups being isolated from their community and support networks.

The Galway Traveller Movement undertook a HIA on a low-grade Traveller accommodation and developed a toolkit to look at the conditions on Travellers sites<sup>7</sup>. Given the close relationship between accommodation and Travellers health, IPH recommend this toolkit is considered in conjunction with the review of planning permission for future Travellers specific accommodation. This will provide a checklist for planners to identify aspects which will contribute to the site and identify mitigation factors that could alleviate negative health impacts or promote positive health impacts.

IPH welcome the opportunity to discuss this submission in further detail with the DoE.

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## References

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<sup>1</sup> Metcalfe, O, Higgins, C, Lavin, T (2009) Health Impact Assessment Guidance, Dublin: Institute of Public Health in Ireland. Available at

[http://www.publichealth.ie/sites/default/files/documents/files/IPH%20HIA\\_0.pdf](http://www.publichealth.ie/sites/default/files/documents/files/IPH%20HIA_0.pdf)

<sup>2</sup> All Ireland Traveller Health Study Team (2010) All Ireland Traveller Health Study. Our Geels. Dublin: UCD School of Public Health and Population Science. Available at

[http://www.dohc.ie/publications/aiths2010/ExecutiveSummary/AITHS2010\\_SUMMARY\\_LR\\_All.pdf?direct=1](http://www.dohc.ie/publications/aiths2010/ExecutiveSummary/AITHS2010_SUMMARY_LR_All.pdf?direct=1)

<sup>3</sup> McMahon, M (2005) Perceptions of Health and Health Services by the Traveller Community in the Greater Belfast Area. Belfast: The Royal Hospitals

<sup>4</sup> All Ireland Traveller Health Study Team (2010) All Ireland Traveller Health Study. Our Geels. Dublin: UCD School of Public Health and Population Science. Available at

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<sup>5</sup> Glackin, D (2008) Health Impact Assessment of the Doneraile Traveller accommodation proposal, HIA Ireland. Available at

[http://www.publichealth.ie/files/file/Health\\_Impact\\_Assessment\\_of\\_Doneraile\\_Traveller\\_accommodation\\_proposal.pdf](http://www.publichealth.ie/files/file/Health_Impact_Assessment_of_Doneraile_Traveller_accommodation_proposal.pdf)

<sup>6</sup> All Ireland Traveller Health Study Team (2010) All Ireland Traveller Health Study. Our Geels. Dublin: UCD School of Public Health and Population Science. Available at

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<sup>7</sup> Galway Traveller Movement (2009) Travellers' Health Matters. A retrospective health impact assessment of low-grade Traveller accommodation. Available at <http://www.publichealth.ie/files/file/HIA/ASSESSING%20CONDITIONS%20ON%20TRAVELLER%20SITES.pdf>