

Equality Commission

FOR NORTHERN IRELAND

Ms Jenny McGuigan
Causeway Exchange
1-7 Bedford Street
Belfast
BT2 7EG
Jenny.mcguigan@communities-ni.gov.uk

31 July 2019

Dear Ms McGuigan

Re: Focussed consultation on draft design guide for Travellers' sites in Northern Ireland

Thank you for the opportunity to respond to the above focussed consultation.

The Commission's 2017 [Statement on Key Inequalities in Housing and Communities in Northern Ireland](#) identified that a key inequality existed in that '*access to appropriate accommodation for Irish Travellers is limited*'. In particular, it noted at paragraph 8.19 that '*Beyond the 2010 research noted above [All Ireland Traveller Health Study], the Commission has not been able to identify up-to-date information with regards to the general levels of adequacy of specific types of sites – including for those beyond the management of the NIHE. Consideration should be given to the extent to which such factors persist and any prevalence within certain types of accommodation and / or tenures etc.*'

Our 2019 [Equality in Housing and Communities policy recommendations](#) include the following – *ensure that the accommodation needs of Travellers are met, in consultation within the Traveller community*. It notes, at paragraph 6.13, the absence of recent research as referred to in the Statement.

I attach copies of both publications for ease of reference.

Below are a number of comments and queries with regard to the draft design guide.

1. We welcome paragraph i which states the intention of the guide to contribute to 'high quality and sustainable Traveller sites which meet residents' traditional and cultural needs', and the acknowledgement that 'there is no single 'one size fits all' Travellers' site.
2. As regards paragraph iv, it is our understanding that the provision of transit sites remained the responsibility of local councils.
3. At paragraph xxiv it states that this guidance should be considered in the development of new sites and for sites that have to be 'substantially

redeveloped'. Clarification of 'substantially redeveloped' would be useful, perhaps with examples.

4. We welcome the emphasis across the publication to consultation with a range of stakeholders, particularly Travellers. This is aligned to our own recommendation referred to above, which encourages consultation and engagement with, and the involvement of, members of the Traveller community in matters of relevance to their accommodation.
5. Clarification or contextualisation would be helpful of the requirement at paragraph 19 that sites should be developed so that they 'reduce the need for long-distance travelling'.
6. There seems to be a tension between paragraphs 19 and 105/106. The former states that sites should be developed so they reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys); while the latter talks about the health and safety / public liability / cost and management / space issues with providing areas for work. These latter paragraphs state that the provision of facilities for some level of activity will only be considered in exceptional circumstances. These elements of the guidance appear to be contradictory, and clarification would be useful.
7. It is suggested that a footnote is given to the NIHE report referenced in the second sentence of paragraph 92. Further detail on the nature of the communal facilities being referred to would be helpful, to clarify whether it is a facility for community activities, or communal toilets / washing facilities, as both are mentioned.
8. We welcome that paragraph 137 includes guidance on ensuring site compliance with the DDA.

If a discussion of any of the points made above would be of assistance, please do not hesitate to contact me.

Yours sincerely



Deborah Howe
Senior Policy Officer

Direct line 02890 500599
Email dhowe@equalityni.org