

Response to the Wirral main modifications consultation on behalf of Irish Community Care

Introduction

1. This response has been produced on behalf of Irish Community Care [REDACTED]
2. Irish Community Care (ICC) is a long-established organisation that exists to ensure well informed, empowered, and vibrant Irish, Irish by Descent, Irish Traveller and Gypsy Traveller communities in the North West of England. We are ambitious and forward thinking; championing the rights, experiences and needs of Irish communities for over 50 years.
3. ICC is a key partner in delivering the Irish Government’s Diaspora Strategy. We provide an important safety net for Irish people away from home and offer a focal point for diaspora engagement. We are proud to:
 - Deliver and sustain vital services that reach out to and care for the most vulnerable and marginalised Irish emigrants. ICC improves access to services, entitlements, and opportunities to empower individuals and communities and enhance quality of life.
 - Promote equality, diversity and inclusion reaching out to underrepresented groups i.e., Irish Travellers, people in prison, Irish people of dual / mixed heritage, LGBTQI+ among the diaspora.
 - Heal the relationship with Irish emigrants who left Ireland in crisis because of discrimination or experience of institutional abuse.
 - Strengthen mutually beneficial partnerships locally, regionally, nationally, and internationally to build the profile of Irish communities abroad, facilitate wider reach across communities and strengthen the diaspora voice.
4. As a small charity our reach and connections are across a wide area; the breadth of our partnerships and influence is extensive. ICC services play a vital role in reducing social and cultural isolation, improving mental and physical health and

enabling people to become active citizens participating in local activities and generating a sense of belonging in local communities.

5. The response is solely concerned with policy WD 9 Accommodation for Gypsies, Travellers and Travelling Showpeople. We have a number of concerns with the policy as amended and the evidence base which is now out of date:
 - The wording of the policy
 - The lack of identified need (particularly in the light of the 2023 PPTS update and the age of the GTAA)
 - The lack of allocations to meet need
6. It should be noted that ICC whilst having previously responded to the 2018 consultation were not resourced to be able to respond the pre submission plan nor take part in the examination. ICC now have the funded support of myself so are able to provide a detailed response to the main modifications consultation.
7. Appended to the response is an extract of a national report on site provision that contains a case study on the Wirral which amongst other matters makes reference to the local plan examination. We have been unable to find any further documents on the examination website regarding Gypsy and Traveller sites despite having spent a considerable amount of time looking, and as such offer our apologies in the event of having missed and important information.

The wording of the policy

8. We would suggest that the following is deleted:

contribute towards meeting evidenced needs;

9. PPTS does not require there to be need in order for permission to be granted on a site. See para. 11 of PPTS. .
10. Furthermore, the following should be deleted:

6. not cause nuisance to neighbouring uses, particularly in relation to vehicle movements, servicing and outdoor activities;

11. None of the other housing policies use the word nuisance, and policy WD23 adequately covers this issue. As such, it is not clear why the Gypsy and Traveller policy should include this criterion.

The lack of identified need

12. The extract from the Kicking the Can Down the Road Report details some serious failings in the GTAA – essentially – there is need in Wirral, but it simply has not been counted as need for the reasons set out in the GTAA. Furthermore, it appears that both the Lisa Smith judgment and the subsequent amendment to PPTS have not impacted upon the level of need.
13. It is not clear whether the findings of the GTAA have been interrogated in any depth by the examining Inspectors (and I accept that they may have not previously been invited to do so).
14. As matters stand, the plan is not in conformity with PPTS as it does not have a robust estimate of need (in so far as the GTAA found need – but no requirement for the LPA to meet it).
15. Finally, the GTAA is now 5 years old and is out of date. As such, it is not based on an up to date understanding of need in Wirral.

The lack of allocations to meet need

16. Given that the GTAA did identify need, the local plan should make allocations to meet that need.

What should happen next?

17. Whilst we understand that the plan is required to progress, the issue of Gypsy and Traveller need has not satisfactorily addressed in our view. As such, we would ask the examining Inspectors hold a session to discuss how this matter might be best dealt with.