



7 December 2014

Objection to the allocation for and use of land at Stratford Road, Warwick as a potential Site for Gypsies and Travellers, in response to the 6-week consultation period instigated by Warwick District Council

To whom it may concern,

As a resident of Warwick since 2001, I write to express my considered objections to the proposal for a gypsy and traveller site on Stratford, Warwick, currently under consultation as part of the Local Plan. I believe the Council is acting with a complete lack of rationality and objectivity in proposing a site which:

a) has been clearly demonstrated to be unfit for the purpose of habitation, on grounds of noise and air pollution from major roads including the M40 which will be directly adjacent to the site, proximity to water courses posing a flood risk, including the river Avon which also runs adjacent to the site, and close proximity to a large sewage works. These issues are particularly important for caravans and mobile homes which lack the protection afforded by conventional buildings, and as such they contravene numerous guidelines for the siting of gypsy and traveller sites (e.g., The Department for Communities and Local Government (“DCLG”) Planning Policy for Traveller Sites (“PPTS”), The DCLG National Planning Policy Framework (“NPPF”), The DCLG Designing Gypsy and Traveller Sites Good Practice Guide (“GPG”). The full reasoning for these shortcomings has been more extensively explained in the document entitled “Land at Stratford Road, Warwick: Objection to the allocation for and use as a Gypsy and Traveller site” submitted by the Chase Meadows Residents Association, which I fully endorse, and will refer to further as “the CMRA objection”.

b) would require significant effort to mitigate the issues described above, as well as to provide suitable access to the site to allow for the manoeuvring of mobile homes, emergency vehicle access, and safe turning points, which does not currently exist. These measures, which are further described in the CMRA objection, have not been fully considered and as such are not yet proven as feasible or deliverable. As such, the site does not meet a key test of being suitable for immediate development, and the full cost and time requirements of developing the site for this purpose are unknown.

c) would require significant investment of taxpayers money to develop for this purpose, which would not be covered by the rents collected. A calculation demonstrating a potential funding shortfall of circa £280,000 has been detailed in the CMRA objection. However this calculation is conservative at best, as it does not include the additional costs which might result from the mitigations needed. In

recommending this site, the Council are effectively signing a 'blank cheque' at the taxpayers expense.

d) would have significant negative impact on the local economy, particularly the further development of the Tournament Fields business park and the remainder of the proposed development site. The proximity of a large gypsy and traveller site will have a significant impact on the ability of developers to successfully market commercial land to high quality businesses, meaning that the land will either stay vacant for longer, or be let or sold to lower quality businesses. Either way, it will impact the perception of Warwick on visitors approaching the town along the A429, which is the main approach road into Warwick, including many of the approx. 750,000 visitors to Warwick castle per annum. The impact to the economy of Warwick can only be negative, and the extent to which the Council have failed to consider or assess this impact can be seen in the revealing fact that this element of the Council's own Sustainability Assessment, this is graded as, simply, "?". Similar concerns will apply to the Chase Meadow residential development, which is still expanding towards the A429.

e) being a large site, will impact significantly on the existing community, particularly the small residential community at Longbridge. As more fully explained in the CMRA objection, the decision to scale this site at 15 pitches goes against the best practice guidance which increasingly recommends smaller sites as preferential both for the Gypsy and Traveller community and the settled community. The increased success of smaller sites in Ireland is also referenced in the The Department for Communities and Local Government's Designing Gypsy and Traveller Sites Good Practice Guide, para 3.7.

f) will place further demands on the already overstretched schooling and GP facilities in the Chase Meadow area. Traveller communities place high demands on schooling - with the 2011 census determining that 45% of such households have dependent children compared to the national average of 29%. Despite investment in extending the school, last year Newburgh was oversubscribed, with a cutoff radius of 0.9 miles, which would already exclude the proposed site. Given the ongoing development of Chase Meadow, the demand is only increasing. A further primary school has been mooted at Aylesford School, however until sufficient additional capacity is in place this proposal should not proceed. Similarly, I also believe that the local GP surgery does not have sufficient capacity to support additional demand. As a previous patient of the GP surgery on Chase Meadow, I found it increasingly difficult to get an appointment, due to demand, and have ended up moving to an alternative surgery. It is not clear to me what additional capacity is planned to support the growing needs of the community.

Having reviewed the results of the earlier consultation process published by Warwick District Council in March 2014 (Sites for Gypsies and Travellers: Preferred Options for Sites) I note that two sites very close to this location were themselves classed as 'Red' and dismissed. The reasons for dismissing GT20, which was on the other side of the J15 interchange, included:

- *Part of River Avon LWS and potential LWS*
- *Not desirable in terms of potential impact on water environment*
- *Large proportion of site in Flood Zone 3*
- *Noise and air quality issues from surrounding road network including M40 and A46*
- *Access unlikely to be achievable*

The reasons for dismissing GTalt14, which lay on the A429 Stratford road north of the sewage works, included:

- *Within Cordon Sanitaire of sewage works with accompanying smells*
- *Flood Zones 3, 3a and 3b on northern third of site. Flood Zone 2 across eastern quarter of site*
- *Unsuitable for any residential use*

Since this proposed site sits midway between these two rejected sites, and less than a mile from either, it will inevitably suffer from many of the same issues that resulted in the rejection of these two sites, including noise and air quality from the M40 and A46, flood risk, access issues and proximity to the sewage works. These have been described above and more fully within the CMRA objection. It is remarkable, therefore, that the Council have chosen to include the site as a preferred option at such a late stage, and to publish it in the draft Local Plan, having not included it in the previous consultation rounds, and without a full understanding of the measures required to address these issues and deliver the site.

I can only conclude that due to the Council's desire to urgently close the shortfall in the number of identified sites following the last round of consultation, this new site is not being considered on a like by like basis with the other potential sites which went through the earlier consultation process. I therefore believe the process that the Council is taking in attempting to progress this site is fundamentally flawed, and is unlikely to result in an objective decision which is in the best interests of the communities it is supposed to represent.

The CMRA objection has detailed many of the irregularities in the consultation process the Council has followed (Section 8). My overall perceptions of these are as follows:

- The Council seem to have an excessively high degree of optimism in the potential of the site, despite all the evidence to the contrary, such as the issues shared with the rejected sites GT20 and GTalt14. This extraordinary level of self-belief also extends to the Council's decision to publish the draft Local Plan in parallel to the consultation on the Stratford Road site. This illustrates the extent to which the Executive have already committed to this route and are presenting it to residents as a *fait accompli*. It also increases the risk that objections will not be considered objectively, as it is a well-tested psychological principle that public commitment to a decision greatly increases the tendency of the individuals concerned to act

subsequently in line with that commitment, and to downplay, ignore or dismiss objective evidence which conflicts with the commitment. (For a further explanation of this principle, supported by numerous examples, please refer to *"Influence"*, by Robert Cialdini PhD.)

- The Council appear to have an amazingly high tolerance for risk, at the expense of the communities impacted by their decision. The afore-mentioned "?" with relation to the impact on the economy stands as a particular example of the Council's willingness to discount the consequences of their actions, as does the lack of attention given to the issues of viability, deliverability, or availability of the site. The assessments that have taken place have been severely compromised by the lack of time available, as noted by their authors. The Council appear to be happy to proceed aggressively, despite all these many unknowns.
- In addition, the Council have chosen to delegate authority to proceed with publication to the Executive and/or the Chief Executive, depending on whether the modifications resulting from the consultation are considered to be "material". Delegation of authority to a smaller body inevitably carries with it an increased level of subjectivity risk in decision making, which again demonstrates the Council's self-belief and unwillingness to consider the potential consequences of their actions.
- In this latest round of consultation, the Council appear to be remarkably dismissive of external criticism. By example, I would cite the decision to limit the consultation to the absolute minimum six-week period, and to hold a minimal number of discussion workshops, at inconvenient times, staffed by people who at the Council's own admission were ill-equipped to discuss the proposals (as described in the CMRA objection, section 8). Council leaders also chose not to attend the public meeting which was subsequently arranged by the CMRA on December 4th, in an attempt to address these issues, with Chief Executive Chris Elliot claiming that such meetings "do not aid the consultation process", and Council Leader Andrew Mobbs also declining to attend.
- In addition, the Council also appears to be attempting to restrict and constrain negative feedback in the consultation process, by reducing the criteria on their official Representation Form to just five, in comparison to the lists of 10 and 19 different criteria used in previous rounds of consultation. By doing this, the Council have omitted criteria that would highlight problems or issues with the Stratford Road site, effectively protecting themselves from criticism (please see the CMRA objection for further detail).

In observing these issues, I am struck by the similarities to the phenomenon of 'groupthink', a well-known psychological phenomenon resulting in irrational or dysfunctional decision making by a group. It was originally defined by Irving Janis as a result of his studies into American foreign policy disasters, including the attack on Pearl Harbour and the ill-fated Bay of Pigs invasion. He initially described it as follows:

"I use the term groupthink as a quick and easy way to refer to the mode of thinking that persons engage in when concurrence-seeking becomes so dominant in a cohesive ingroup that it tends to override

realistic appraisal of alternative courses of action. Groupthink is a term of the same order as the words in the newspeak vocabulary George Orwell used in his dismaying world of 1984. In that context, groupthink takes on an invidious connotation. Exactly such a connotation is intended, since the term refers to a deterioration in mental efficiency, reality testing and moral judgments as a result of group pressures.”

The issues I have described above fit closely to Janis’s observed symptoms of decision making groups afflicted by groupthink. Janis also observed that such groups also often suffer from uniformity, writing “*The more amiability and esprit de corps there is among the members of a policy-making ingroup, the greater the danger that independent critical thinking will be replaced by groupthink, which is likely to result in irrational and dehumanizing actions directed against outgroups.*” Whilst I have no sight of the inner workings of the Council, the makeup of the Council Executive demonstrates a remarkable level of uniformity, with eight out of nine members belonging to the Conservative party, and the remaining independent seat vacant as shown on the Council website. Further, considering the specific wards represented on the Executive, four out of the eight are based in Kenilworth, with most of the rest in similarly located wards to the north of Warwick and Leamington (Leek Wootton, Warwick North, and Cubbington). This group is therefore heavily uniform in profile, with similar local interest and without any relevant opposition in place. Given the evidence available to me, I feel the Council is very likely to be suffering from the dysfunctional decision-making processes which Janis describes, and this leads me to believe that the Council’s decision to progress the Stratford Road site is not being taken objectively and as such is fundamentally flawed.

The siting of gypsy and traveller sites is a highly politically and emotionally charged topic. For such developments to be effective, and to result in acceptance by the relevant communities, it is key that councils are seen to be clear, fair, rational and objective in their decision making. This is unfortunately not the case here. In addition to potentially being the wrong decision for the communities involved, the flawed consultation process itself further impacts the potential success of any development at Stratford Road, due to the resentment and sense of unfairness it causes affected residents. I hope that this consultation enables the Council to come to its senses, discount the proposed site, and embark on a more fully transparent and objective selection process.

Yours sincerely,

