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Tynemouth Area Residents' Association's (TARA) response to:

'Tottenham Area Action Plan. Preferred Option Consultation - February 2015'

Tynemouth Area Residents' Association members live in the roads bounded by the ex-gyratory system in Tottenham N15. The location and extent of the proposed plans and developments are, therefore, of major significance to our neighbourhood and community. We acknowledge the urgent need for housing, particularly for those people living in temporary or sub-standard rented accommodation, and those wishing to gain a foot on the property ladder.

However, the effect of these plans will cause social damage that will far outstrip that caused by the riots of 2010. It is shocking that Haringey Council, which is supposed to represent its residents, is facilitating this process. It is bringing in outsiders to overshadow, and in some cases destroy, our homes and communities for financial gain.

Only a tiny percentage of the people involved in these plans, including Haringey councillors, live in or anywhere near Tottenham, or understand our communities. By contrast, the people who are at the heart of the proposed changes are treated with contempt with highly skewed consultations which effectively exclude them from the process.

This document covers:

- 1. Lack of a Fair Consultation Process
- 2. The Council's Poor Record on Major Project Delivery
- 3. Inadequate Healthcare Coverage
- 4. Loss of Green Open Space
- 5. Failure to retrieve Section 106 and Future CIL
- 6. Neighbourhood Areas and Opportunity Sites
- 7. Conclusion
- 8. Appendices

1.

Lack of a Fair Consultation Process

The consultation does not meet the required standards of involving local residents and community groups in an appropriate and timely way. The amount of time for responses to the 4 main documents, plus 15 supplementary documents, is beyond the reasonable capacity of residents to formulate informed responses within the set timescales.

The Council has not given local people and community groups due weight as equal partners in the development of our area. Indeed, the Council, in their ambition to push forward these plans at any cost, in partnership with their stated key stakeholders and partners, has been negligent by obfuscation. The Council has failed to carry out proper consultations with local people.

The Council frequently uses the terms *key stakeholders and strategic partners* when referring to developers and architectural firms. The Council needs to be reminded that local people are key stakeholders too, not extraneous to the process. (See Appendix 1: Formal complaint re the Local Plan documents consultation process, calling for the consultation to be halted and re-scheduled.)

Below are some instances where the Council's ability to hold consultations has been brought into question. They give a flavour of the extent to which local people consider they have been side-lined by the Council - their representatives (Appendix 2).

2.

The Council's Poor Record on Major Project Delivery

There is strong evidence that the Council is not competent to ensure the proper delivery of major projects, as evidenced by two major developments in our area: Hale Village and Spurs. The Council has been out-maneuvered by property developers, and singularly failed to provide the expected outcomes for its local constituents.

Hale Village

- Planned to provide approx 4000 new homes to address local needs. Only 700 provided so far + 1200 student flats, which take up much of the allocated space. Students have little input into the viability of the area.
- Failure to appropriately secure Section 106 contributions.
- Failure to provide on site education facilities, as planned.
- Failure to provide health service centre, as planned. Thus contributing to the wider deficit in health provision in the area (see Section 3 below).
- The developer had to be bailed out with public money due to financial failure. This led to the expansion of the development (increase of height of buildings); developer citing lack of viability of the original plans.

Spurs Development

 The Council failed to secure any of the housing and other benefits to local communities provided for in the original planning application.

In addition:

Tottenham Gyratory System

 Almost 1 year after completion, the Council has failed to address with TfL the unsatisfactory work carried out. It is understandable that local people have little confidence in the Council to meet their obligations.

3.

Inadequate Healthcare Coverage

For over 10 years TARA has taken every opportunity to highlight local peoples' concerns about the healthcare deficit. This deficit has been exacerbated by gradually increasing housing development in the area.

We consider that the Council has been negligent in not addressing this deficit while continuing to give planning permissions.

We refer to para 5.38 and 2.18 in the Tottenham Area Action Plan:

5.38 Healthcare facility of 1500 - 2000 sq m in size to accommodate in the short to medium term, existing and increased demand as the population grows.

Such a provision is likely to meet only the massive existing shortfall – not the new developments. Further, our local General Practitioners at Tynemouth Area Medical Practice advise us that there is great difficulty in this area with recruiting doctors.

2.18 Working positively and collaboratively with both NHS England and the Haringey Clinical Commissioning Group will be the key to ensuring the need for improved primary health care provision in Tottenham is delivered.

Given the Council's slowness in acknowledging the increasing healthcare deficit in the area, we question the ability of the NHS and the Council to deliver 21st century healthcare to existing residents, let alone those of 10,000 new dwellings - which could amount to 30-40,000 new patients.

Any new development must meet with an absolute planning guarantee that the health needs of addition residents will be met via NHS provision.

4.

Loss of Green Open Space

Haringey has many green spaces, parks, greens, allotments, and the Marshes. But we remain concerned that in Tottenham there is still a deficit in green space – children's play areas, sporting pitches, and nature conservation areas. The proposed plans would exacerbate this problem, rather than resolve it.

The importance of green space for recreation, health and wellbeing is well known and acknowledged. Therefore it is alarming to note proposed developments on *any* green area. The Tottenham Leisure Centre Car Park (TG1) is a prime example.

Tottenham Green has undergone huge loss of green space since the 1970s.

The London Plan sets a 'no net loss of green space' policy. Tottenham Green area has suffered massive loss of green space over recent years:

- 1970s-80s: Prince of Wales Hospital grounds built over Coppermill Rd housing estate; Tottenham Girls Grammar playing fields built over: Eleanor Close housing
- 1990s: Blanche Neville School grounds built over bus garage extension
- 2000s: Clyde Rd Depot biodiversity rich brownfield site Bernie Grant Arts
 Centre, Isabel Place housing

(Judith Hanna [Clyde Area RA, Friends of Tottenham Green, Sustainable Haringey], Mar 2015)

Down Lane Park is another example of 'nibbling away' at our green spaces. The inclusion of green areas as Site Allocations is, therefore, totally unacceptable and does not meet the requirement of the London Plan.

5. Failure to retrieve Section 106 and future CIL

The 'Local Plan Alterations to Strategic Policies' documents states:

- 1. The Council will expect developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals. (formerly core strategy, February 2015, Page 31 Alt 81)
- 2. CIL is a new levy that the council <u>will</u> apply to qualifying developments. (formerly core strategy, February 2015, P30 Alt 30)

Para 1 implies that developers will have an option to pay this levy. Given the Council's poor record of securing this levy (Hale Village and the Spurs development) there is little confidence - or evidence - that the Council will improve its record.

Further, CIL is unlikely to raise the levels of finance necessary to provide the amount of community infrastructure (healthcare, education, etc) necessary to serve such large developments. Has the Council considered future revenue needed to keep them running?

6.

Neighbourhood Areas and Opportunity Sites

Seven Sisters/West Green Road and Tottenham Green and Neighborhood Area - Tottenham Hale

We want to comment on all of the site allocations relevant to our area, but the limited timescales set for this consultation prohibit us from being able to give adequate consideration and consultation with residents. Therefore, we object to these Site Allocation plans. The following, however, should be noted in respect of Tottenham Leisure Centre Car Park (TG1) and Apex House and Seacole Court (SS3):

Tottenham Leisure Centre Car Park (TG1)

This would be a totally inappropriate site for housing development given its location within the Tottenham Green Conservation Area. Development on this land which, if necessarily should be extremely limited, should provide facilities in the form of outside sports or informal exercise areas. Some protected wildlife areas should be strategically located to enhance the visual aspect of the site and to provide a green corridor between the recently upgraded Tottenham Green West, and the adjacent railway line. Some car parking provision should be retained.

Apex House and Seacole Court (SS3):

The 22 storey tower block being proposed for this site is entirely unacceptable and an inappropriate development for this area. The link between high-rise buildings and social problems is well documented (see Appendix 3). We acknowledge that this site is suitable for more appropriate development that is in keeping with the local character and environment of the area.

See our previous submission in 2014 which details objections to other sites (copy attached: TARA 06Mar14 DPD response.doc).

7.

Conclusion

The Tynemouth Area Residents' Association committee and resident members object to these massive and overwhelming plans, that will leave Tottenham in development blight for decades, and leave residents in a state of uncertainty and anxiety for years, with overcrowding and lack of services for local residents.

Previous developments managed by Haringey Council have seen social infrastructure provision jeopardized, and there is no change or infrastructure outline to suggest otherwise alongside these massive developments.

We consider the demolition and redevelopment of viable council housing amounts to social cleansing which will disproportionately affect BME families. This reflects the failure of Council policies over their years of tenure. We ask the Council to put residents before developers by consulting residents appropriately, and ask you to refer to the *Our Tottenham Planning Policy Working Group*'s formal complaint regarding the consultation process (Appendix 1).

8.

Appendices

- Appendix 1: Our Tottenham Planning Policy Working Group.
 Formal complaint re the Local Plan documents consultation process, calling for the consultation to be halted and re-scheduled
- Appendix 2: Examples of failure by the Council to consult residents as key stakeholders.
- Appendix 3: High-rise living means crime, stress, delinquency and social breakdown. Instead, we must Create Streets

Appendix 1:

Our Tottenham Planning Policy Working Group

Formal complaint re the Local Plan documents consultation process, calling for the consultation to be halted and re-scheduled

To: Cllr Ali Demirci, Mr Stephen Kelly and LDF team - LBH Planning

As we approach the end date for the consultation period on Haringey Council's planning polices and related document I write from the Our Tottenham Planning Policy Working Group (active on behalf of the Our Tottenham Network) to request that the consultation be halted and re-scheduled because the process is fundamentally flawed.

We have done our best to publicise and explain the consultation process to all our contacts throughout Tottenham, despite our lack of resources and capacity and the extremely challenging material we are encouraging public responses to. However, despite our best efforts, we have found this an impossible task to do effectively for the reasons set out below.

Fair and lawful consultation

Haringey Council's Consultation Charter states that the Council undertakes consultations "so that people who live and work in the borough have a say in the Council decision making process and know that their views have been taken into account."

In the recent Moseley judgement against Haringey Council by the Supreme Court the judges set out the conditions for fair consultation. These are: "First, that consultation must be at a time when proposals are still at a formative stage. Second, that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Third,... that adequate time must be given for consideration and response and, finally, fourth, that the product of consultation must be conscientiously taken into account in finalising any statutory proposals."

The Supreme Court unanimously agreed that the Council acted unlawfully by not telling local people what all the options were [regarding consultation over planned Council Tax charges], misleadingly implied that there were no possible alternatives, and gave no information about why they had decided to implement their planned new system targeting the borough's poorest residents rather than spreading the burden more evenly across all residents. The consultation had made it seem that the Council had no choice, which was incorrect, and was so unfair that the Court declared it to be unlawful.

Fundamental flaws in the current consultation

We argue below that this current consultation breaches all the four conditions set out by the Supreme Court, and the Council's own Consultation Charter. In making this formal complaint we provide the following evidence of how the consultation has been flawed in engaging residents in the decision-making process and outline the concerns collated in comments from many organisations in the Our Tottenham network.

- 1. A version of the latest draft Site Allocations document was submitted during the previous statutory consultation process in 2010 this process culminated in the Examination In Public for the Haringey Local Plan. On 25th June 2010, the Haringey Federation of Residents Associations objected that the then consultation over proposed Sites was 'Not Compliant or Unsound' for the following reasons:
- a. We have reviewed the entire document and find that the information provided is so incomplete and inconsistent from site to site that coherent response is not possible.
 b. As a minimum the site diagrams should be to a constant scale, indicate North points, all road and street names be clearly labelled, building numbers shown, and adjacent sites in the
- road and street names be clearly labelled, building numbers shown, and adjacent sites in the same ownership identified.
- c. The Local Authority should also have adequately researched the ownerships and made clear that all building owners and residents of these sites have already been informed of the Local Authority's proposals with regard to them.
- d. We would wish to comment on each site when a coherent document is available.

As a result of these complaints made by the HFRA and others at the Examination In Public in 2011 the Council agreed to withdraw the document.

2. However, the current Site Allocations DPD and Tottenham Area Action Plan documents are similarly flawed. The Site Allocations and TAAP documents contain 'typos' - mistakes that give the impression of a project that is being rushed. They include no street names and hence most Haringey residents will be unable to ascertain what exactly they cover. The sites information is hopelessly sketchy and this makes it meaningless to comment on vague information. There are many spelling mistakes and maps that are wrong. The documents contain serious content mistakes such as some sites being in one document but not in the other. The failure to provide detailed, accurate and/or unbiased information prevents or restricts the ability of residents to comment on the proposals.

The information is sometimes biased and/or appears to be deliberately misleading in hiding the intentions. For example, the information about Broad Water Farm (SA63) portrays what the Council must have known are highly controversial proposals as being 'Potential improvements of the housing estate to improve stock, design of the site and routes through the area.' This may sound innocuous. Yet local community reps' conversations with planning officers revealed the real agenda is to promote mass demolitions of homes, accompanied by house-building on the neighbouring park. Further, no information is provided on why the 3 Housing Association estates in the northern part of the 'zone' are included - but it transpires that the Council want to promote future Tall Buildings across these relatively recently-built low-level estates.

- **3.** The process is not offering a genuine status quo on the identified SA sites, and across the board the presumption is to build something new on the sites rather than keep, improve and/or refurbish the current buildings and/or usage. This mirrors the notorious and unlawful Council Tax consultation, and contravenes the principles which led to the recent Supreme Court judgement against the Council.
- **4.** The process is flawed because on some sites extensive work has been done by the Council or organisations working for it to draft and develop plans. For example, the pre-March 2015 Tynemouth Road Residents' Association (TARA) response to the Local Plan

design brief workshop on Friday 20th March to discuss the initial brief for a building on Tottenham Leisure Centre car park. How can this be allowed when the site is out for consultation? It all suggests this is a done deal – at least in the minds of the Council. Similarly, the Council is progressing with the demolition of the Love Lane Estate and has issued the initial public notice. Yet, the council claims nothing is fixed and being included as a site doesn't mean there will be any development there.

- 5. In choosing to have only a six-week consultation the Council are not giving adequate time for local people to consider complex changes of deep and long-term significance in making decisions about planning and development in the borough. The voluminous 'supporting evidence' was not published sufficiently in advance of the documents and these proposals cannot be challenged without first understanding and analysing this evidence. As you must appreciate it is difficult to do this work with a longer and more comprehensive process, let alone in the very short time line you have set.
- 6. There has been conflicting information provided on when the consultation actually ends. Various official sources have the closing date as 23rd, 25th, and 27th March. In addition, the consultation is not valid because of the failure to individually inform affected business and affected residents by letter. We request a list of all the addresses in Tottenham formally notified in this way.
- 7. There have been very little pro-active attempts to engage with residents. As far as we know there was only one special public meeting (as opposed to a few 'drop-in' sessions) held at 163 Park Lane on Wednesday 11th March - for the entire Tottenham, and possibly for the whole borough. We are aware of the formal complaint made about this meeting and trust you will be taking that into account. But for the record the key points are set out here. The meeting was scheduled to start at 4pm. People attending the meeting were left waiting on the street until the officers arrived with the keys. The building was not opened until 4.18pm when the officers had just arrived. They then had to set up the room. In other words, a good part of the allocated time was wasted; it was ill-prepared and showed scant respect or regard for the residents and local community who had come to the meeting. Given that the issues are so serious and the implications for our neighbourhoods so immense, this was entirely unacceptable. Would developers be treated in the same manner? In addition, officers were not wearing their name badges, to differentiate them from people attending the meeting, and it is still not clear if there were full and proper minutes taken to record local views.
- 8. Other important opportunities to engage with local people were actually rejected by the Council. For example, the Tottenham and Seven Sisters Area Forum was cancelled despite other area forums being held. Again, entirely unacceptable, especially since Tottenham Hale ward is at the centre of many of your plans. Reasons given to residents for cancellation were risible and are again set out for the record. First, that the March 9 meeting was too close to the previous meeting; second that the date was close to the general election, and third that all the ward councillors were consulted and agreed it should be cancelled as they had several other meetings to attend. As residents we would ask, shouldn't having a dialogue with residents about the plans be a top priority for the Council since they will form the basis for the developments you wish to undertake? This was deeply disrespectful to residents as though their views and comments do not matter. The council has not organised any other meeting for residents as far as we know, and we would argue that this was and remains your responsibility given that these are your plans, your proposals about our neighbourhoods. You have the money, the officers and the resources to organise these meetings, yet they have not taken place.
- 9. The meeting now called for Tottenham Hale is for March 28th after the close of the formal consultation, and is described as an 'information day'. We do not accept this is adequate or indeed, constitutes consultation. A meeting for residents of Chestnuts Estate where major March 2015 – Tynemouth Road Residents' Association (TARA) response to the Local Plan

developments are proposed which could lead to loss of people's homes was called at the last minute and neither they nor the ward councillors were properly informed.

- 10. The Council has failed to promote residents' involvement as fully as required, even in its own communications channels. The e-alert Haringey People Extra on Friday 20th March did not mention that the consultation process was soon to close. Neither do the communications do more than present a positive upbeat picture of these changes to residents, rather than signposting to them the key issues which might concern them, such as loss of public housing, fewer socially rented homes, effects on green space, lack of local social infrastructure etc. That would be fairer and a more transparent approach. The Council is fully aware of Tottenham's demography but has not tailored its consultation to take account of this.
- **11.** The consultation period also saw the publication of 15 large supporting documents. Given the task of understanding the four main documents, it has been impossible to both read and understand the supporting documents in the six weeks of the consultation. This restricts the ability of residents to make informed contributions to the consultation.
- **12.** No accessible version of the documents has been provided and this is a serious failure to obtain the widest involvement of residents. In addition, the online documents were provided as pdfs and not in Word versions. This makes it very time-consuming for respondents to draft their responses to the documents. The council should be enabling involvement, not hindering the ability of residents to access the format of the documents.
- **13.** According to p10 of the Tottenham AAP, para. 1.17: 'Initial consultation on the broad proposals for Tottenham was undertaken in January 2014. A number of public consultation events were also held that attracted over 80 residents and stakeholders. The full report is available on the Council's website www.haringey/localplan/tottenhamaap but in summary the comments received highlighted a number of common themes: '

That link is invalid. Where is the report referred to? It does not seem to be here either: http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps. The documents and links fail to evidence how Haringey Council's Tottenham AAP new draft and Sites Allocations take into account the comments received to the consultation in January 2014. However, absolutely no indication or evidence of how, whether and to what extent any of the comments, feedback and objections received by the Council during that previous consultation has altered the Council's preferred course. It is impossible to know whether any comments made by any resident or community group in Tottenham were taken on board. As far as the response submitted by the OT Planning Policy Working Group in March 2014 is concerned, most if not all comments, suggestions, objections and requests were ignored. This contrasts with the practice during consultations over previous iterations of the Local Plan (Unitary Development Plan and Local Development Framework) in acknowledging, responding to and publishing the details of each individual response to the draft Plan, adding what changes had been made (if any) as a result.

Consultation rescheduling

All of the flaws means the consultation is an unfair and unlawful attempt to force the Council's pre-determined agenda on residents. The odds are stacked against residents and local businesses being able to effectively engage and respond unless they can afford to hire lawyers or consultants to do so for them.

A. For the reasons above we request that this consultation be halted and replaced by a fresh consultation later in the year with improved documentation, adequate time to consider them, and a fresh programme of events organised by the Council to pro-actively March 2015 – Tynemouth Road Residents' Association (TARA) response to the Local Plan

engage people in the decision-making process. The period until the introduction of the fresh consultation should include briefing events on the numerous supporting documents.

B. In the alternative we call for an additional 6 weeks starting from 28th March in which the above activities can be organised.

We as a network are happy to help promote and be partners in effective and fair consultation processes.

We await your acknowledgement of the complaint and how the council will respond to the concerns and flaws in the consultation process.

Yours sincerely,

Dave Morris

- for the Our Tottenham Planning Policy Working Group

Note: The Our Tottenham Planning Policy Working Group is active on behalf of the Our Tottenham network. Organisations affiliated to the network include (as of 23.3.2015): Bull Lane Playing Fields Campaign / Weir Hall Action Group, Chestnuts Community Centre, Clyde Area Residents Association, Day-Mer, Defend Haringey Health Services, Dissident Sound Industry Studios, Dowsett estate Residents Association, Efiba Arts, Find Your Voice, Friends of Downhills Park, Friends of Lordship Rec, Growing-In-Haringey network, Haringey Alliance for Public Services, Haringey Defend Council Housing, Haringey Federation of Residents Associations, Haringey Friends of Parks Forum, Haringey Green Party, Haringey Housing Action Group, Haringey Independent Cinema, Haringey Justice for Palestinians, Haringey Left Unity, Haringey Living Streets, Haringey Needs St Ann's Hospital, Haringey Private Tenants Action Group, Haringey Solidarity Group, Haringey Trades Union Council, Living Under One Sun, Lord Morrison Hall / Afro International, Lordship Rec Eco-Hub Co-op, N. London Community House, Peoples World Carnival Band, Selby Centre, Taxpayers Against Poverty, The Banc, Tottenham and Wood Green Friends of the Earth, Tottenham Chances, Tottenham Civic Society, Tottenham Community Choir, Tottenham Community Sports Centre, Tottenham Concerned Residents Cttee, Tottenham Constitutional Club, Tottenham Rights, Tottenham Theatre, Tottenham Traders Partnership, Tower Gardens Residents Group, Tynemouth Area Residents Association, Ubele, University and College Union at CONEL, Urban Tattoo, Wards Corner Community Coalition, 1000 Mothers' March Organising Group, 20's Plenty for Haringey

Appendix 2:

Examples of failure by the Council to consult residents as key stakeholders.

In a verbal exchange at the Tottenham Strategic Regeneration Framework meeting on 24/7/14, Cllr Strickland, in response to Gloria Benson's comment that consultations were rubbish, bombarded people with vast amount of complex information and did not make provision for languages, other than English, he admitted that consultations needed to be improved.

Verbal exchanges between Gloria Benson and Cllr Reith (Area Forums 2/2/15 + 21/10/14): Gloria Benson expressed local concerns that the changed format for Area Forums reduces input from local residents, and people were fed up with not being able to air their views; this is evidenced by the considerable decline in attendance over the period of time when major consultations over the future of Tottenham are taking place. Cllr Reith admitted that this has been noted by the Council which is undertaking a review of the forums. A bit late!

Tottenham Hale Regeneration meeting, Have Your Say 2014: in a lengthy presentation the main speaker totally failed to mention the proposed vast redevelopment of the area including the planning permission already granted for a 9 storey Premier Inn. Beth Thomas, a local resident, pointed out that the presentation was conspicuous by its glaring omissions rather than what was included. This was just a skewed exercise so that people could decide where to put the flower pots, and deeply worrying. Further, the Area Regeneration Manager, Peter O'Brien, responded to a question about future health care provision in relation to planning permissions by stating that the Council had no responsibility to ensure adequate health care provision to account for the additional residents in new developments.

Appendix 3:

High-rise living means crime, stress, delinquency – and social breakdown. Instead, we must Create Streets

Source: http://www.policyexchange.org.uk/media-centre/blogs/category/item/high-rise-living-means-crime-stress-delinquency-and-social-breakdown-instead-we-must-create-streets

The vast majority of tower blocks and multi-storey housing estates are the product not of the market, but of state control and the planning system. We should instead be allowing developers to create streets. Streets, houses and low-rise flats are more popular, provably better for the people who live in them (especially if they are social tenants or families), a great long term return for the landowner and, critically, achieve the same density as the post-war estates they could replace.

For twenty years, very few multi-storey estates were built in Britain. Between 1979 and 1998, only six buildings above 35 metres were built. Why? Because the government-mandated post-war experiment in high-rise living was a disaster. Summoned into existence by the 1956 Housing Subsidy Act (which offered higher public subsidies the higher the building), the 4,500 tower blocks built by 1979 quickly descended into a frightening dystopia. Communities resisted moving. The new multi-storey housing become 'hard-to-let'. Families and households refused to move in. The Thamesmead Estate, completed in 1968, was 40 percent full by 1974. 55 per cent were refusing to move into the Broadwater Farm Estate within five years of completion

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Why are tower blocks and large slab blocks so unpopular? Why do 89 percent of Britons want to live in a house on a street, 0 percent in a tower block and only 2 percent in an apartment?

Why do so few people chose to live like this? Why do social tenants account for 21 per cent of all households with children, but 79 per cent of those living on or above the fifth floor? Why are children in social housing are sixteen times more likely to live on or above the fifth floor than children not in social housing? Is this just a naïve British desire for cottages and country roses? Far from it. People are being deeply rational. Many peer-reviewed, controlled studies show that even when you take account of social and economic status, high-rise living is correlated with social breakdown, crime and misery ...