

2.Matter Two-General Issues for Development Sites DPD

2.1 (a) It is impossible for me to comment on the whole borough as to whether or not the scale, type and distribution of the allocated sites conform to London Policies and are consistent with the Development/Core Strategy and so I have chosen only one policy 2.5 (London Plan 2.15) and the sites alluded to re Policy 2.5. Regenerate Ealing Town Centre.

On paper it would appear that the policies and sites generally conform to the London Plan. However I doubt if many policies/site allocations are achievable. The main reason being that many of the sites are privately owned and therefore it is up to the land owner/developer to decide what they think is viable for them and in many cases in the past the choice has not been the one allocated to the site.

A recent example connected to Policy 2.5 (b) *Uxbridge Road between Ealing Broadway and West Ealing-high quality head offices and ancillary functions.i.e.the Office Quarter*

Westel House was a tall office block at 32-38 Uxbridge Road (EAL14-30 residential units and 7424 sq metres of office space) but it has now been demolished and in its place will be a 22 storey residential block and 111 bedroom hotel-The Apex. The application was passed in 2011 and so far there is little evidence of speedy construction.

90,000sq metres of office space will not be attainable if there is nowhere to put it. The Premier Inn (Office Quarter) is on the site of offices as is the Travel Lodge (also in the Office Quarter).

The Core Strategy (2.5 g) refers to a boutique hotel but when The Apex is completed (will it call itself a boutique hotel?) there will be 3 hotels in the Office Quarter, the boutique hotel Xanadu in Bond Street, the boutique hotel Drayton Court in West Ealing, the Maitrise Suites in West Ealing and the proposed budget hotel also in West Ealing. Other than the Drayton Court, which had been an Edwardian railway hotel, none of these hotels were on sites allocated for a hotel or even mixed use.

London Plan Policies

2.15 Strategic

with regard to Policy 2.15 A...*competitive choice of goods and services accessible to all Londoners, particularly by public transport, cycling and walking.*

Given what seems to be currently happening in Ealing Town Centre the choice of goods seems to be diminishing week by week and Ealing Broadway as a high quality (2.5 b &c) retail destination will not be achievable. The Dickens Yard developers have promised that the shops within the development will be of a high quality or in their terms 'appeal to the aspirational shopper' but as Westfield is expanding and will include yet another well known department store, the future of high quality retail in Ealing Town Centre must be in doubt.

I have already referred to the Arcadia site in Matter 1-1.3. (Arcadia Centre) and the loss of various retail units within the centre and the loss of such units combined with the reduction of other retail units over the past few years means that certain goods

can only be obtained by using a car or travelling quite long distances by public transport.

London Plan Policy 2.15

Planning decisions

C ©

'support and enhance the competitiveness, quality and diversity of town centre retail, leisure, arts and cultural, other consumer services and public services'

London Plan Policy 4.6 C

LDF preparation

b designate *and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration*

d promote *and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal*

Ealing Core Strategy 2.5. (b) 2.5 (e)

Development Site EAL6

EAL6 is the only site designated for leisure, arts and culture and although Policy 2.5 (b) refers to a cultural and community quarter-the last remaining cinema (apart from the frontage) was demolished in 2008, the YMCA building has been empty for 6 years, Pitzhanger Manor has received some lottery funding but more funding is needed. A restoration proposal was made in 2006 but never acted upon and the current proposal seems to be remarkably similar to that one.

I did propose, in my response to the site document, (and approached Regeneration in 2008) that the YMCA (owned by the council) would make an excellent arts centre/film museum therefore freeing up the Pitzhanger Manor Gallery to be a much needed restaurant. The Council response (DS58(39)) to a film museum was nothing and to an Arts Centre-no resources.

However because the site allocation proposes retail, commercial and residential as well as a cinema a developer could just provide a small cinema and no leisure, arts and cultural facilities.

A great deal of time and money was wasted on a feasibility study that would create cultural facilities within the Town Hall.

London Plan Policy 2.15 C (h)

Reduce delivery, servicing and road user conflict

This is a problem not addressed in either the Core Strategy or the development sites document and it is a major problem along the Uxbridge Road and roads leading off the Uxbridge Road. The Broadway Centre is one of the few developments where deliveries and services are catered for underneath the development from a service road. I believe the same is true of Dickens Yard. The Uxbridge Road contains numerous supermarkets and convenience stores where deliveries can only happen from the Uxbridge Road therefore causing traffic delays and dangers for cyclists.

Sometimes large delivery lorries have to cross over pedestrianised areas to deliver goods. Will the proposed 50,000sqm of gross retail floor space have sustainable delivery and services that don't cause conflict?

London Plan 2.15 D (LDF preparation)

e promote the provision of Shopmobility schemes and other measures to improve access to goods and services for older and disabled people

This provision does not seem to be at the forefront of any of the Ealing documentation. I think there is one mention of Shopmobility in Appendix 2 of the Core Strategy. The only current Shopmobility scheme in Ealing will be lost when the Arcadia centre is redeveloped.

Having seen the comprehensive Shopmobility scheme at Westfield one can understand why disabled people prefer to shop there rather than Ealing. That is if they can get on a bus.

I cannot see any schemes or measures in either the DM DPD or the Sites document that would improve access to goods and services for the elderly and disabled. One has to continually fight just to get accessible public transport, disabled parking and drop off points. Accessible toilets are impossible to find (London Plan 2.72). Ealing Broadway station does not even have a lift. It will when Crossrail arrives (not in 2017 probably 2018/19) but there will not be level access to the trains.

2.1b

I believe that the potential number and type of development should be specified for each development site.

The UDP site documents were much clearer but often had a codicil-development capacity should be used as a guide only.

The UDP sites outlined overall capacity, potential number of housing units, retail, employment, community facilities, public open space etc etc all under clear headings. Constraints and Opportunities and Development principles were outlined as bullet points and a site photo and aerial photo were also included.

I have not looked at every site document but the ones I have looked at and have responded to there seems to be no overall vision just mixed use development that can include retail commercial and residential but without any figures.

2. Matter Two-2.2

Re in terms of provision for particular needs

This matter was discussed at length during the Core Strategy hearing but I still cannot see in either the DM DPD or the Sites document anything other than housing, retail and office space.

It would appear that the Council believes that an increased population can be absorbed into the health, educational, sports and community facilities that are currently available without providing any more facilities.

This is despite the findings of the Strategy Needs Assessment 2012-2013 that outlines the health (and educational problems) within the Borough.

Appendix A shows the health summary for Ealing.

It is an extremely lengthy report and so I have just quoted various sections that I think are relevant to a lack of health, sports and educational facilities-

The proportion of children achieving a good development at age 5 has increased but is still low

GCSE achieving is lower than the England average

The prevalence of CVD in Ealing is predicted to increase in the next ten years, which will put an increasing burden on health services

Ealing PCT has a high emergency rate for CVD when compared to London and the England average.

Improving diabetes care is a priority for Ealing Clinical Commissioning group

Ealing has the highest asthma emergency admission rate amongst 0-18 years old in London.

Ealing's TB rate in 2011 was 78.8/100,000 second only to Brent in NW London-higher than national and London averages.

Ealing is statistically worse than England for overweight and obese children aged 10-11 years

High levels of tooth decay in children

Overall satisfaction with GP surgeries-Very satisfied
England 55%
London 45%
Ealing 39%

No new health centres are proposed for Ealing Town Centre (2,580 mixed tenure new homes) and the 'refurbishment or other solution for Mattock Lane Health Centre'

is unresolved and the intention is to close A&E and Maternity at Ealing Hospital. And there appears to be just one new school in the whole of the borough.

There is also an under provision of community facilities within large developments. The community facility at Dickens Yard is only 325 sq.metres. The Spa is for residents only.

2. Matter Two

2.3 Will they provide for an appropriate housing mix, including affordable housing?

During the Core Strategy hearing we were assured that there would be an achievable provision of affordable housing. However I still question if this is possible. I have also referred to this issue in Matter 5-5.4/5.5.

It is difficult to keep track of all the current developments being built and so I have used the data from the AMR-2011-2012 to illustrate my concerns and also the St.Bernard's application that has just been passed by the Council.

The AMR-Table 3.5.5 Affordable housing completions (Appendix A) shows that the affordable housing ratio can only be achieved on either housing association owned developments or council ones.

P/2009/4007-28 units is owned by A2 Dominion

P/2009/3809-36 units is owned by the Council

P/2009/2975-31% affordable units-privately owned and, as usual, the GLA toolkit is used to justify this percentage. (Appendix B)

P/2008/4509-applicant unknown! 25% affordable

Permissions re residential units-2011-2012-721, of which 22% are affordable units.

However as the St.Bernard's application uses current policies it is an up to date illustration of how the problems of affordable housing are not being addressed and I can see similar problems occurring on many of the sites proposed in the sites document.

This is an extract from Matter 5-St.Bernard's application

In P/2012/5040 the affordable housing element is 27.6 %.(Council figures)

The GLA response was-*'The level of affordable housing has not yet been shown to be the maximum reasonable that can be suggested & hence compliance with the London Plan has not yet been demonstrated'*.

The GLA then goes on to say that in fact-'the net level of affordable housing is therefore only 37 units (13.5%) which is considered a low level of provision.

With regard to the other application for the site PP/2012/4008 the GLA also raised concerns with regard to the level of affordable housing and residential mix.

Protection and enhancement of Grade II Listed Heritage Assets were cited in the viability assessment.

The Council has asked for there to be a provision of affordable housing to be provided through a registered provider. What this actually means I don't really know-various registered landlords, housing associations, where? No mention of an actual financial contribution.

The Joint Strategic Needs Assessment 2012-2013 also voices concerns about affordable housing and overcrowding. (Appendix C)

As regards housing mix re the actual number of what is now referred to as habitable rooms I still question (hours were spent discussing this at the Core Strategy hearing) whether or not the developments are providing or will provide enough 3 and 4 bedroom units given the housing need.

In the Strategic Housing Market and Needs Assessment, Executive Summary of September 2009 it states

'The housing Planning Policy Statement 3 identifies the government's core objective of providing a variety of high quality market housing and addressing any shortfalls that apply in the market sector. ...

'Two-thirds of the current market stock is one or two bedroom flats and terraced houses. The stock has a small supply of three and four bedroom units in this sector and future development has therefore to address the imbalance of stock type and size, both by tenure and location to create a more sustainable and balanced housing market.

*...
It is recommended that to create a more balanced housing stock, future development proportions could be rounded with delivery of 60% one and two bedrooms and 40% three and four bedroom houses.'*

I did give examples in my Core Strategy submissions but as it is now 2013 I will use, once again, the St. Bernard's application as an example.

P/2012/5040 only 7% are 3 and 4 bedroom units

P/2012/4008 only 10% are 3 bedroom units and there are no 4 bedroom units

Matter Two.2.
2.4/2.5/2.6

2.4

Is 'mixed use' a clear enough term to guide development?

Personally I don't think 'mixed use' is a clear enough term but unfortunately the London Plan uses the same term.

I think the site allocations should be far more prescriptive so that the aims of the Core Strategy can be achieved, however, as I have mentioned many times, it seems to be up to the developer or site owner what is actually built or developed on a site. This also affects the safeguarding of land for 'mixed use' purposes.

Are the allocations deliverable or viable?

Just one example-

Core Strategy 2.5 Regenerate Ealing Town Centre

The office quarter-

Obviously the developer who is building The Apex (residential and a hotel) on the site of the demolished Westel House (offices) did not think that office space was viable in the Office Quarter. 22-24 Uxbridge Road was offices and is now a Premier Inn. In a cabinet meeting in 2006 22-24 Uxbridge Road had another allocation.

'This proposal is based on the ability to accommodate a part of the affordable housing element of the Dickens Yard scheme on the site of 22-24 Uxbridge Road (council owned) and increase the proportion of private accommodation on Dickens Yard (council owned land). In doing, this a 'marriage value' is created because the increased private accommodation on Dickens Yard has a higher value than the counterpart on Uxbridge Road.'

The policy states that there should be up to 90,000 sq. metres increased office space but Ealing Cross-a new office complex- has 80,000 sq. feet of space available, despite a fancy brochure showing a rather glamorous Ealing and a cheaper rate than Chiswick Park.

I did not comment on EAL8-the Police Station (soon to be defunct) in the Uxbridge Road Office Quarter but the Mayor's office for Policing & Crime/Metropolitan Police Service did, and MOPA/MPS wanted the allocation changed to office & residential led development, including ancillary commercial uses.

It has not been changed but will MOPA/MPS present a development application that includes residential and is supported by the Mayor's Office?

Much is made of the coming of Crossrail but all the presentations have emphasised how quickly one will be able to get to the West End and Canary Wharf-not the reverse journey.

However perhaps some 'high quality head offices' have expressed an interest in moving to Ealing.

2.5

Are the sites deliverable where comprehensive development is expected and sites are occupied and/ or in multiple ownership?

I have to admit to a scant knowledge of how ownership of land and development actually works. It was only about fifteen years ago that I realised one could put in a planning application for a development without actually owning the land and also that a planning application can be granted and the original applicant then approaches someone else to develop the land. There are numerous estate agent boards around Ealing that show planning applications that have been approved and are just waiting for someone to be interested in developing the land.

I could not quite understand the original Arcadia application (refused at an Inquiry) in that there will still plots within the site that were not owned by the developer.

For example-How can development at EAL5-Lamertons be achieved if it has multiple private owners?



The upper floors on the High Street side of EAL5 have been empty for about fifteen years. Will the owners now finally agree to development?

2.6

Is sufficient consideration given to monitoring and triggers for review?

I assume that the main monitoring vehicle is the AMR but, for instance, one application in the Table 3.5.5-affordable housing completions- dates back to 2004 and many to 2008.

Although legally developments have to be started within 3 years quite often something is demolished and the land can stand empty for those 3 years e.g 22-24 Uxbridge Road-demolished in 2007-hotel opens in 2012.

What if the Southall Gas Works site stands empty for the next 13 years? 3,500 residential units.

2. Matter Two
2.2
Appendix A

- Significantly worse than England average
- Not significantly different from England average
- Significantly better than England average



Domain	Indicator	Local No. Per Year	Local Value	Eng Avg	Eng Worst	England Range	Eng Best
Child Communities	1 Deprivation	60414	20.3	19.8	83.0		0.0
	2 Proportion of children in poverty †	19085	23.5	21.9	50.9		8.4
	3 Statutory homelessness †	208	2.1	2.0	10.4		0.0
	4 GCSE achieved (5A*-C inc. Eng & Maths)	1812	57.3	58.4	40.1		79.9
	5 Violent crime	8113	28.9	14.8	85.1		4.5
	6 Long term unemployment	1281	8.7	5.7	18.8		0.9
Child Health	7 Smoking in pregnancy †	236	4.1	13.7	32.7		3.1
	8 Breast feeding initiation †	5234	60.8	74.8	95.0		64.7
	9 Obese Children (Year 6) †	852	21.1	16.0	26.8		9.8
	10 Alcohol-specific hospital stays (under 18)	40	60.1	81.8	154.9		12.9
	11 Teenage pregnancy (under 18) †	154	31.8	38.1	64.9		11.1
	12 Adults smoking †	n/a	19.2	20.7	33.8		8.9
Adult Health	13 Increasing and higher risk drinking	n/a	19.2	22.3	28.1		18.7
	14 Healthy eating adults	n/a	30.0	28.7	19.3		47.8
	15 Physically active adults †	n/a	8.8	11.2	5.7		18.2
	16 Obese adults †	n/a	18.1	24.2	30.7		13.9
	17 Incidence of malignant melanoma	20	7.4	13.6	28.8		2.7
	18 Hospital stays for self-harm †	403	100.0	212.0	809.8		49.8
Disease with Alcohol	19 Hospital stays for alcohol related harm †	7840	2392	1865	2276		91.0
	20 Drug misuse	2018	13.0	8.9	30.2		1.3
	21 People diagnosed with diabetes †	18054	6.5	6.5	8.1		3.3
	22 New cases of tuberculosis	211	68.6	15.3	124.4		0.0
	23 Acute sexually transmitted infections	2620	919	775	2276		152
	24 Hip fracture in 65s and over †	200	408	492	665		324
Life expectancy and Quality of Life	25 Excess winter deaths †	118	19.8	18.7	35.0		4.4
	26 Life expectancy - male	n/a	78.9	78.6	73.9		85.1
	27 Life expectancy - female	n/a	83.5	82.6	79.1		89.8
	28 Infant deaths †	21	3.8	4.8	6.3		1.2
	29 Smoking related deaths	307	184	231	372		128
	30 Early deaths: heart disease and stroke †	216	82.8	87.9	129.2		85.8
31 Early deaths: cancer †	271	104.4	110.1	159.1		77.9	
32 Road injuries and deaths †	108	84.1	44.3	128.9		14.1	

† Substantially similar to indicator proposed in the Public Health Outcomes Framework published January 2012

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Health summary for Ealing 2012

Indicator Notes:

1 % people in this area living in 20% most deprived areas in England, 2010 2 % children (under 16) in families receiving means-tested benefits & low income, 2009 3 Crude rate per 1,000 households, 2010/11 4 % at Key Stage 4, 2010/11 5 Recorded violence against the person crimes, crude rate per 1,000 population, 2010/11 6 Crude rate per 1,000 population aged 16-64, 2011 7 % mothers smoking in pregnancy where status is known, 2010/11 8 % mothers initiating breast feeding where status is known, 2010/11 9 % school children in Year 6 (age 10-11), 2010/11 10 Persons under 18 admitted to hospital due to alcohol-specific conditions, crude rate per 100,000 population, 2007/08 to 2009/10 (pooled) 11 Under-18 conception rate per 1,000 females aged 15-17 (crude rate) 2008-2010 12 % adults aged 18 and over, 2010/11 13 % aged 16+ in the resident population, 2008/2009 14 % adults, modelled estimate using Health Survey for England 2006-2008 15 % aged 16 and over, Oct 2009-Oct 2011 16 % adults, modelled estimate using Health Survey for England 2006-2008 17 Directly age standardised rate per 100,000 population, aged under 75, 2006-2008 18 Directly age sex standardised rate per 100,000 population, 2010/11 19 Directly age sex standardised rate per 100,000 population, 2010/11 20 Estimated users of opiate and/or crack cocaine aged 15-64, crude rate per 1,000 population, 2009/10 21 % people on GP registers with a recorded diagnosis of diabetes 2010/11 22 Crude rate per 100,000 population, 2008-2010 23 Crude rate per 100,000 population, 2010 (chlamydia screening coverage may influence rate) 24 Directly age and sex standardised rate for emergency admissions, per 100,000 population aged 65 and over, 2010/11 25 Ratio of excess winter deaths (observed winter deaths minus expected deaths based on non-winter deaths) to average non-winter deaths 1.08.07-31.07.10 26 At birth, 2008-2010 27 At birth, 2008-2010 28 Rate per 1,000 live births, 2008-2010 29 Directly age standardised rate per 100,000 population aged 35 and over, 2008-2010 30 Directly age standardised rate per 100,000 population aged under 75, 2008-2010 31 Directly age standardised rate per 100,000 population aged under 75, 2008-2010 32 Rate per 100,000 population, 2008-2011
Source: APHO www.healthprofiles.info

Matter 2
2.3
Appendix A

Table 3.5.5 Affordable housing completions

Site	Ref	Total Units Delivered	Total Affordable Units	Social Rented Units	Intermediate Units
(PART OF ACTON HIGH SCHOOL SITE) GUNNERSBURY LANE, ACTON	P/2004/4096	13	13		13
5-7 OTTER ROAD & 180 WINDMILL LANE GREENFORD	P/2008/1477	13	13	13	
62 HORN LANE ACTON	P/2008/4102	21	21	21	
MANOR HOUSE SCHOOL 16 GOLDEN MANOR, HANWELL	P/2008/4509	36	9	9	
SOUTH ACTON ESTATE PALMERSTON ROAD, ACTON	P/2008/4713	125	125	84	41
20 DRAYTON GREEN ROAD WEST EALING	P/2009/2696	1	1	1	
ACTON CENTRAL INDUSTRIAL ESTATE ROSEMONT ROAD, ACTON	P/2009/2875	45	15	10	5
BRITANNIA CLOSE NORTHOLT	P/2009/3722	19	19	19	
631-635 WHITTON AVENUE WEST GREENFORD	P/2009/4007	28	28	18	10
DERELICT CARPARK LOCATED AT CORNER OF HIGHLAND AVENUE AND HANWAY ROAD, HANWELL	P/2009/4174	15	15	15	
EASTCOTE LANE NORTH NORTHOLT	PP/2009/3809	36	36	36	
THE CLUBHOUSE 78 - 80 GOODHALL STREET PARK ROYAL	PP/2009/4377	11	11	11	

Matter Two
2.3
Appendix B



1 INTRODUCTION

- 1.1 In accordance with local and strategic planning policy requirements, a GLA Toolkit Appraisal has been prepared to accompany the planning application for 45 residential units, of which 31% are proposed to be affordable tenures, on the Acton Central Industrial Estate site.
- 1.2 The purpose of this Affordable Housing Statement and the accompanying GLA Toolkit appraisals is to demonstrate that 31% affordable housing is the maximum reasonable contribution that the proposals can make towards affordable housing whilst allowing the scheme to remain viable and deliverable.
- 1.3 It should be noted that the application proposals represent a significant reduction in the developable floorspace submitted in December 2008 which has in turn reduced scheme viability and the amount of affordable housing that the scheme is able to provide.
- 1.4 The financial information contained in this report, including the appraisals, is provided to the Council on a confidential basis due to the commercially sensitive nature of its content and should not to be made available to any other party without the prior written agreement of the Applicant.

Joint Strategic Needs Assessment
2012-2013

2.3 Appendix C
P.1.

Ealing already has a high degree of housing need, especially in comparison to its neighbouring boroughs in West London. That need is increasing as unemployment continues to rise in the borough and people need more support to find and afford a home.

The Council has modelled the impact of the coalition government's welfare reforms and this shows that approximately 3,000 families will be directly affected by proposed changes. This is likely to have an impact on housing and the level of need. People will be less able to afford to rent in the private rented sector and measures such as the single room rate (from 2012), under occupancy penalties from 2013, and the ongoing increases in non-dependent deductions will impact considerably on particular households, often those who are already the most vulnerable.

The Council is already working to minimise the impact on the most vulnerable and those most severely affected through targeted visiting to give an impact assessment and financial advice.

Overcrowding is a significant issue for many of Ealing's residents. It is estimated that over 19,240 (Household survey analysis 2009) are living in overcrowded properties. Demand for family sized social housing over the next 10 years is likely to exceed 5,000 units and is a clear indicator of the shortage in Ealing. (Assertions made above are based on the SHMA 2009 unless otherwise attributed) The level of overcrowding is concentrated in BME households, 21.7 per cent of whom are more likely to require larger homes overall.

Need is becoming more acute for the most vulnerable. Unemployment and falling incomes have together driven up demand at the lower end of the housing market.

Public funding for affordable housing has been significantly reduced and the prospect for higher investment in the future seems extremely limited. Funding for new social housing is limited and the replacement product 'affordable rent', is an untried new product that may work in cheaper areas of the borough but not others.

But Ealing has been building new homes for social rent. Over 100 new homes in the last 18 months, with plans for more through new freedoms in the way council housing is funded.

The results of Ealing Council Private Sector House Condition Survey 2010 indicates that the worst conditions are to be found in the private rented sector.

Housing in Multiple Occupation (HMOs), form a considerable proportion of the private sector stock. An estimated 5.3% of dwellings are HMOs (5370 buildings). The national average for HMOs is approximately 2%. Survey of HMO properties showed that 20.1% communal areas were not in a reasonable condition; 91.9% did not have heat detectors in shared parts and 88.3% did not have landlord/agent details displayed. Only 10.9 % of

2.
2.3

Appendix C
P.2

properties had an electrical safety certificate available and 15.6% had a gas safety certificate.

Overcrowding remains a problem in the borough as a consequence of a lack of affordable housing and high proportions of ethnic minority groups. Around 19% of all households in Ealing were overcrowded in the 2001 census, making it the 14th most overcrowded local authority in England. Of the homes that were overcrowded, 31% were privately rented.

Ealing's 2010 House Condition Survey estimated using the bedroom standard that 11.1% of households were overcrowded with the Southall sub area having 19.1%, which was the highest rate in the borough.

Under the statutory minimum standard for housing (Housing Health and Safety Rating System) the 2010 House Condition Survey found that 24.5% properties in the private rented sector had category 1 hazards. These are more serious hazards where the council has a statutory duty to take action. The main hazards found in Ealing were falling on stairs, excessive cold and falling on level surfaces.

The use of illegally occupied outhouses is a growing problem in the area. We have only recently begun to collate data on this problem and so far a joint working project between Planning Enforcement and Regulatory Services have evidence of 1067 illegally occupied buildings (these have been identified through street surveys and complaints from members of the public and other agencies such as the police and fire brigade) and 79 roads have been referred as having a high level of occupied out houses.

5.3 Crime

Social, economic and environmental determinants of health include 'crime rate in the local area', as one of several factors which together have a powerful influence on health within the population.¹

The London Health Inequalities Strategy 2010 states that 'feeling safe at home and in the community is fundamental for mental health and well-being'.² Crime and the fear of crime have impacts on both physical and mental health and wellbeing. Individuals, groups and communities are affected by the spectrum of crime from the most serious violent crimes to the lower level manifestations of anti-social behaviour. The Chartered Institute of Environmental Health notes that where anti-social behaviour takes hold, it can pose a serious threat to community life, undermining people's sense of safety, their well-being and, ultimately, their health. A small group can demoralise a whole neighbourhood by carrying out acts of environmental crime.³

¹ Ealing Health and Wellbeing Strategy 2010

² London Health Inequalities Strategy GLA April 2010

³ http://www.cieh.org/policy/anti-social_behaviour.html