

My name is Peter Geoffrey Hall. I am Bartlett Professor of Planning and Regeneration at University College London. I am an Honorary Member of the Royal Town Planning Institute and in 2003 received their Gold Medal for services to planning, the first to be awarded for twenty years. I am an Honorary Fellow of the Royal Institute of British Architects and in 2008 I received the Sir Patrick Abercrombie Prize of the International Union of Architects. In 2005 I was awarded a Lifetime Achievement Award by the Deputy Prime Minister for my contributions to urban regeneration and planning. I have been writing on planning issues for nearly 50 years and have published some 40 books on planning and planning-related topics – in particular, *Cities of Tomorrow* (1988), a history of 20<sup>th</sup>-century planning, now in its third edition. In 2005 I received the Balzan International Prize for my work on the social and cultural history of cities since the beginning of the 16th century. I am President of the Town and Country Planning Association, of the Regional Studies Association, and of the Ealing Civic Society, though I wish to emphasise that this statement is a purely personal one that represents my own view, not that of the Society. I asked to submit such a personal statement because I greatly admire the initiative of the Society and its allies in seeking, virtually single-handed and with slender means, to halt a development that I believe would fatally and permanently compromise the built quality of one of the most remarkable suburban environments to be found anywhere in England.

My special qualification and interest is in strategic metropolitan planning, on which I have researched and written for over 50 years. I have extensive consultancy experience and, though not professionally qualified in architecture or urban design, have worked in multidisciplinary teams on these issues. In particular, from 1975 to 1979 I was a member of the government's Environmental Board, charged with advising the Secretary of State for the Environment on how to improve the quality of urban built design. In 1997-98 I was invited to join Lord Richard Rogers' Urban Task Force, and played an active role in writing the report *Towards an Urban Renaissance*. In 2002 I advised DUCH, a Spanish developer, on the regeneration of the Chama tin train station (Prolongación de la Castellana), in Madrid. In 2008 I accepted an invitation from CLG to join the Eco-Towns Challenge Panel, tasked with the responsibility of pressing the promoters of Eco-Towns to enhance their design.

I have been a resident of the London Borough of Ealing for the past 36 years and of the Ealing Broadway ward for the past 15 years. Throughout, I have taken a close interest in the planning of the borough. In 1996 I published a paper, “Ealing: The Queen of London's Victorian Railway Suburbs”, in the journal *Urban Design Studies* (Vol, 2, pp. 33-44). I have given many lectures on the development of London in general and on Ealing in particular, most recently at the 2008 Annual Lecture of the Ealing Civic Society. I have referred to Ealing as a classic Victorian suburb in many presentations and publications, too numerous to mention here; most recently, in an introduction to a new symposium on suburban development published by the Smith Institute, currently in press.

In my writings I have constantly extolled the principle of increasing density in and around town centres with good transport accessibility and high-quality shopping and public services. In my textbook *Urban and Regional Planning*, which first appeared in 1974 and has gone through four editions, I specifically refer to the 1952 General Plan for Stockholm as the model for such development. This plan was based on planned suburban developments along the Stockholm underground system featuring pyramids of rising density of residential development around the stations, which also incorporate shops and services. As a member of the Urban Task Force, I actively helped to develop and I fully endorsed our recommendation in favour of higher-density development pyramids in our 1998 report *Towards an Urban Renaissance* . The much-cited diagram in the report, of mixed use development around a transport interchange, might almost have been based on Ealing Broadway. Importantly, there is no indication here of heights or massing, which would have been inappropriate in a general illustrative diagram.

I emphasise this background in order to develop my central argument to this inquiry: what is now proposed for the Arcadia site is not at all wrong in principle, but wrong in its detailed execution. It is entirely at the wrong scale and the wrong density for the site in question. I have read and I endorse the opening statement of Counsel on behalf of the Rule 6 parties, which represents my views precisely: this proposal does not suit Ealing. And here, though I have asked permission to appear as an independent

witness, I ally myself with the Rule Six parties: we, the people who spend all our everyday lives in Ealing, are best qualified to know.

There can of course be no absolute mathematical formula to determine questions like these. They must be resolved by informed judgement. Here the evidence of English Heritage is most salient. It concludes:

In the opinion of English Heritage this scheme neither preserves nor enhances the character or appearance of Ealing Town Centre and Haven Green Conservation Areas, nor does it preserve the setting of nationally and locally listed buildings. This harm is serious.

The scheme, they say: “would fail either to preserve or enhance the existing character or appearance of the conservation areas, by virtue of its alien form, materials, bulk, height and scale ... As a result the homogenous suburban scale and palette that currently characterises the conservation area would be detrimentally affected”.

This states the case succinctly. But I submit that it actually understates the real extent of the impact. For a key feature of Ealing Broadway is the scale of the conservation areas that surround the central commercial area, stretching generally for about one mile or more in all directions, which characterise Victorian and Edwardian Ealing and support its well-known claim to be the “Queen of the Suburbs”. Of course, Ealing is not absolutely unique in this respect. Other London suburbs, built at the same time around train stations, have some of the same qualities. But Ealing is arguably unique in the scale and coherence of these suburban areas, and in the limited degree to which they have been altered over a century and more since they were built.

What is the essential quality of these areas, and what justified their designation as conservation areas? It is necessary to take a walking tour, preferably with the relevant pages of Pevsner as a guide, to appreciate it. But essentially, it is that of an arcadian suburb, very carefully designed through a process of collaboration between the borough architect/chief executive Charles Jones, and the owners of the large estates surrounding the station – above all, the Wood family of Church Stretton in Shropshire, who gave their names to many of the streets (Woodville, Madeley,

Corfton). The streets, radiating out from the station in a dendritic pattern that owes much to the model of the first garden suburb in Bedford Park, are lined by detached 2- and 3-storey houses in their own gardens, all at a density of about 30 dwellings per hectare, identical to Raymond Unwin's 1912 recommendations for suburban density and now adopted by CLG as a minimum density for new development. I have argued that this pattern provides a model for the kind of suburbs we should be seeking to build in the 21<sup>st</sup> century.

But my submission is that this would be fatally and permanently compromised by the development now being considered. The addendum to the Ealing Civic Society's Proof of Evidence (*Robert Gurd, Ealing Civic Society, Addendum to proof of evidence: Views A – L*), albeit compromised by the thick midsummer foliage which disguises the visual impact between November and May, gives a graphic illustration of the aggressive intrusion which would result from the proposed development at almost every turn in these streets. There can be no doubt that right across these areas the scale of the Glenkerrin development, above all the height of the towers, would impinge almost everywhere as a kind of extreme visual shock, destroying at a stroke the scale and massing of the houses and their relation to the streets, and the Arcadian calm that is the entire area's quintessential quality. To put it succinctly, even starkly, this development would destroy the essence of what Ealing is.

Thus, critically, the proposal fails on at least two of the critical questions set out in the Secretary of State's call-in letter:

“a) the extent to which the proposed development is consistent with Government policies in Planning Policy Statement 1: Delivering Sustainable Development. In particular whether the design principles in relation to the site and its wider context, including the layout, height and massing, scale, open space, visual appearance and landscaping, are appropriate in their context and take the opportunities available for improving the character and quality of the area and the way it functions;”

“c) the extent to which the application in and adjacent to a conservation area and nearby listed buildings accords with national policy as set out in Planning

Policy Guidance Note 15: Planning and the Historic Environment. In particular regard to the consideration of the preservation or enhancement of the character or appearance of conservation areas”.

The then-Secretary of State and her advisers were clearly sufficiently concerned about these points to take the unusual step of a call-in. It will be for the inquiry to determine whether it can satisfy her successor in this regard. I would submit that it cannot.

It might be legitimate to approach the issue by asking what kind of development would be appropriate on the site and in the circumstances. I would again stress that there can be no definite answer possessing the quality of absolute correctness; as ever, it is a matter of judgment. The right way to begin such an exercise, I submit, is to site oneself on the far (north) side of the Green and look south towards the station and Broadway. Villiers House, above the station, is out of scale and intrudes aggressively into the visual environment, but at least it is an isolated structure, off-centre from Haven Green, and may well be demolished in any redevelopment of the station.

A better measure, therefore, is obtained by considering existing development elsewhere around the Green. Apart from Greenlaw Court, an isolated eight-storey residential tower occupying the short block on the north side between Mount Park Road and Woodfield Road, the highest structures are those forming part of the large 1930s Haven Green Court development occupying most of the north side, which are five stories high. I would submit that these provide an acceptable benchmark and measure for the height limit that should also operate on the opposite, south, side of the Green. The present proposal exceeds these limits by a factor of nearly six, and thus massively fails to meet the essential criteria (a) and (c) set out in the call-in letter.

Thus the basic problem with the proposal under consideration, I would submit, is that it starts from the wrong premise, proceeding through a perverse logic, to a fundamentally mistaken solution. Instead of starting on the basis of the maximum scale that is acceptable in context and then working out what can be profitably achieved at that scale, it starts with the principle of maximising the profitable use of

the available ground area without any reference to context, and is thus led to an extremely complex engineering solution which further increases the need for density.

Central here is the form of the deck over the railway. The Supplementary Planning Guidance essentially suggests that this should be an extended bridge structure carrying vehicles and pedestrians, and connecting two separate developments north and south of the tracks. Such a deck, it is generally agreed, is a highly desirable and even essential part of any scheme, providing a new through way from the Broadway to a reconstructed station. But there is absolutely no need for huge load-bearing structures over the tracks, and this seems to have been a key factor in driving up the density and massing of the present proposal. Indeed, I would cite the case of the Chama tin scheme in Madrid, which decks over the tracks with a lightweight non-load-bearing structure, simply to create an extremely pleasant public open space.

This, I submit, should be the case at Ealing Broadway. The correct solution is surely to create structures on either side of the railway that on the north side are compatible with the existing development around Haven Green (maximum five storeys) and on the south side are compatible in scale with the Broadway (maximum four storeys), connected by a lightweight non-load-bearing deck structure spanning the rail tracks between them, which would support an attractive open pedestrian space connecting directly from the Broadway to the station forecourt at the east end. I conclude therefore by proposing that the present proposal should be decisively rejected in favour of a complete re-design along these lines.

I have one concluding point. An inquiry like this must necessarily take account of a great volume of evidence, much of it of a technical and even esoteric nature. But it must finally come down to a matter of judgment, and that will never be encompassed by a narrow consideration of numbers. I would remind the inspector of one of the most famous inquiries in the entire history of British planning: that into the location of a Third London Airport, conducted by the commission headed by Mr Justice Roskill, which took place between 1966 and 1969. In its 146-page report, the Commission summarised what was perhaps the most elaborate and most academic planning study ever made in the UK, or perhaps anywhere: a highly professional team, in which

economists predominated, conducted a most thorough cost-benefit analysis of the short-listed alternative sites, in which heroic attempts were made to render all costs and benefits in monetary values – even to the point of costing the value of a Norman church, threatened with demolition, by reference to its insurance value. It concluded that the airport should be built at a place called Cublington in the Vale of Aylesbury. But Colin Buchanan, the most celebrated planner of his generation, was a member. Increasingly troubled, he wrote a 12-page Memorandum of Dissent, in which he took his stand on purely emotional grounds: it would, he wrote, “be nothing less than an environmental disaster if the airport were to be built on any of the inland sites, but nowhere more serious than at Cublington where it lies athwart the critically important belt of open country between London and Birmingham”. His approach to the issue had been entirely different: he had simply gone and stood on the summit of the Chilterns, looking out at the site: the fields, the villages, the great country houses. He concluded:

Time and time again since the end of Stage V, I have recalled Mr Niall MacDermot’s words in his closing address when he said that anyone standing on one of the famous vantage points of the Chilterns and looking out over the Vale of Aylesbury would say, ‘It is simply unthinkable that an airport and all it implies should be brought here’. These words rang very true when I recently stood on Ivinghoe Beacon and looked north-westwards over the Vale (G.B. Commission Third London Airport 1971, 153).

His eloquence proved decisive: the government of the day rejected the majority recommendation, and to this day the Vale of Aylesbury has the same face as Buchanan saw forty years ago. I think this approach was profoundly the right one on that occasion, and that it is equally right in this case. I urge you, sir, to go out on Haven Green, as Buchanan once did on Ivinghoe Beacon, and look for yourself. I think you will conclude, to adapt those words of Buchanan, that it is simply unthinkable that a development like this and all it implies should be brought here.