



**HANGER HILL GARDEN ESTATE  
RESIDENTS ASSOCIATION**

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**1st February 2023**

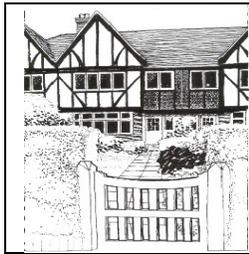
**Comments on Draft Local Development Plan Regarding Area Designated as MOL 20 On behalf of the HHGERA Planning Conservation Panel**

We have studied the details of Ealing Council's proposal to remove protected status from Hanger Hill Park, Fox Wood, Hanger Hill Wood and Barclays Sports Grounds, and to allow residential development on the latter.

The HHGERA object to the removal of MOL (Metropolitan Open Land) status in the strongest possible terms and refute Ealing Council's current report in criteria A, B, C, that 'the open space itself is not of historic, recreational or biodiversity significance' as this is factually incorrect.

The land area designated as MOL20 has 2 of only 6 confirmed ancient woodlands in the borough so we are astonished that Ealing Council would make such a claim when it's own assessment Review of SINC (Sites of Importance for Nature Conservation) in Ealing regarding Fox Wood, Hanger Hill Park, and Hanger Hill Wood states that:

***"A fine ancient wood on a slope with additional wildlife habitats in the adjacent Hanger Hill Park"***  
***"Wood anemone ... has been recorded here and other woodland herbs such as wood avens..., garlic mustard ... and lesser celandine ... are frequent."***  
***On Hanger Hill Wood:***  
***"Ancient woodland with a good variety of trees and shrubs"***  
***"Map evidence suggests that there has been woodland here since at least the 14th century"***.



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The other four in the borough are Perivale Wood, Horsenden Hill, Tentelow Lane Wood, and Long Wood. They also have MOL status, but the Council scores them much more highly in their current report: it says that they have 'major importance' in criterion c, and they will retain MOL protection. Of course, these sites have the benefit of not being close to Crossrail!

The London Plan requires Local Plans to include appropriate designations and policies for the protection of open space to meet needs and address deficiencies. By de-designating large areas of MOL, this plan does the opposite plus there seems to be no policies to protect existing areas of green space.

In summary, MOL20 deserves 'major importance' classification in criterion C and should therefore have its status as Metropolitan Open Land confirmed in perpetuity.

As for criterion A & B:

Ealing Council is failing to recognise the benefit that the majority of the MOL20 site brings in terms of providing clearly distinguishable separation from the A406 on multiple sides and the delineation between Hanger Hill and North Acton. By comparison with other MOL sites, this would warrant 'major importance' in criterion A.

Barclays Sports Ground must be used to create parks and playing fields (these types of use are consistent with the protected MOL status), multiplying this value. Ealing Council is failing to recognise the recreational, leisure and sports value of MOL20. The site already contains a football club and a golf club, so therefore warrants a high score in criterion B.

Residential development on Barclays Sports Ground (site EA31) cannot be allowed. The entire site must be dedicated to parks and sports facilities for the benefit of the residents, not developers. Once the green space is gone, there will be no way to fix it – it is gone forever.



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Without MOL (Metropolitan Open Land) protection, nothing is stopping these sites from being built over in the future. These sites will be vulnerable to being lost in part or in whole, even though they provide crucially important opportunities for recreation and sports and habitat for wildlife as well as protecting our ancient woodlands.

We note that no proposal is made for introducing Local Green Space protection and so the removal of the MOL designation would leave the entire area vulnerable to future development.

Any residential development on BSG will lead to a huge drop in the quality of life of local residents. Traffic on the roads around BSG (such as Park View Road and Woodville Gardens) are already at top capacity so no new residential development will be sustainable. Traffic in that area including Hanger Lane, has increased dramatically since the opening of the Ava Lovelace School and is already providing significant risk to children as evidenced by the school's ever increasing volume of safety messages.

Our local schools are already over capacity, where will these additional families send their children to school? What about access to GP and dental services? These are also well over capacity.

The point needs to be made that West Acton and the BSG area is very deficient in district and local parks and having a large park on the BSG, as closely as possible approaching the qualities of a district park, is the only way to repair this deficit.

This is a formal objection to Ealing Council's proposal to remove MOL designation from MOL20 as the whole of the site must retain its current status in order to protect its future from any further development proposals.

### **For and on behalf of the HHGERA Planning Conservation Panel**

