



Friends of Firs Farm Objection to the Enfield Draft Local Plan: September 2021

The Friends of Firs Farm (Registered Charity No. 1177069) has the objective to provide or assist in the provision of facilities for recreation and other leisure time occupation in the interests of social welfare with the object of improving the conditions of life of the public in North London/Enfield by supporting the preservation, promotion and improvement of Firs Farm wetlands park and playing fields.

We object to draft policy DM BG10 in the Draft Enfield Local Plan. This allocates Firs Farm Wetlands (Site ID SA59) as a site for burial and/or crematorium use. Based on the points set out below, Friends of Firs Farm call on the Council to remove all reference to Firs Farm wetlands from Policy DM BG16 when the draft Local Plan is finalised and adopted by them.

We oppose this policy because:

1. Firs Farm wetlands is a vitally important community resource, essential to the health and well-being of the local people in many ways.
2. The proposal to site a crematorium at Firs Farm will undermine work to improve the community, flood alleviation and biodiversity value of the area, negating the significant public and private investment that has been made in this and compromise current plans for further improvement.
3. The proposal is directly at odds with the Spatial Vision and Objectives of the draft Local Plan.
4. The draft Policy directly contradicts Strategic Policies SP BG1 and SP CL4 in the draft Local Plan.
5. The proposal is not consistent with the National Planning Policy Framework (NPPF).
6. The proposal is not consistent with national guidance on the development of crematoria.
7. The proposal is not consistent with the policies of the London Plan.
8. The evidence base for the draft Local Plan does not set out a clear and compelling case for proposing cremation/burial use at Firs Farm.



9. The proposal will significantly affect the local Site of Interest for Nature Conservation, and reduce the biodiversity and nature conservation interest of Firs Farm wetlands, contrary to several other policies in the draft Local Plan.
10. The proposal will have an adverse effect on local traffic, and a consequent additional impact on the local environment, and this has not been properly considered in the Integrated Impact Assessment of the draft Local Plan.

These points are developed in detail as follows:

1. Firs Farm wetlands is a vitally important community resource, essential to the health and well-being of the local people in many ways.

Firs Farm is vitally important community resource. It provides a “green lung’ for the surrounding residential areas, with many opportunities for informal recreation and organised sports. The wetlands have an important role in flood alleviation in the area, allowing pluvial flooding to be avoided, particularly in the context of increasing areas of hard-standing from new development and paving front gardens, which has led to increased run-off during extreme weather events and an increased risk of flash flooding. The area also is important in maintaining and improving local biodiversity, and the award-winning wetlands are home to many species of animals, birds and insects. The area now provides an important educational resource for children through the activities of schools and other community groups.

The importance of Firs Farms Wetlands in these terms has increased significantly during the Covid-19 pandemic and lockdown. The area has become a lifeline for local people, and has had an increasingly important role in maintaining good mental health for local people, alongside the opportunities for improving physical health.

This has been recognised by Enfield Council in relevant policy documents. In Enfield’s Blue and Green Strategy¹ for example the Moore Brook corridor (or ‘green lung’) between Pymmes Park to Firs Farm is identified as offering significant opportunities to increase green cover and improve access to existing assets (Paragraph 4.2.6), and Firs Farm is identified as a “Strategic Node” (Figure 14) reflecting its role as a “major area of wetland” (Paragraph 4.2.3). The Strategy identifies Firs Farm as an important area of publicly accessible open space in this area (mentioning in passing the award-winning wetlands) in the context of limited opportunities to diversify existing open spaces within Palmers Green, Bush Hill Park, Southgate Green and Winchmore Hill to alleviate the identified deficiencies, such as children’s playspace and food-growing land (Paragraph 4.4.33). On Page 61 of the Strategy, Firs Farm is identified as a Sports Hub and a location for additional sports pitches to help achieve the Strategy’s Aim 1 of achieving a 25% increase in blue-green infrastructure in Enfield. The Enfield Sports Villages Programme outlined in Appendix 1 of the Strategy identifies Firs Farm as a location for one of the Sports Hubs providing a very unique and

¹ London Borough of Enfield (2021) - **Enfield’s Blue and Green Strategy (2021-2031): Valuing our parks, trees, open spaces, routes, woodlands and watercourses** – Adopted version June 2021.



exciting opportunity to deliver world class sports facilities in Enfield, with the aim to be recognised as centre of excellence, enhancing Enfield's reputation as a premier top sports destination. Similarly, the Enfield river and wetland restoration programme also identified in Appendix 1 to the Strategy identifies Firs Farm as part of the plans for creation of new rain gardens, reedbeds to improve water quality and reduce flood risk as well as deliver other multiple benefits, such as habitat restoration and flood plain naturalisation.

Figure 30 in the Strategy identifies Enfield Council's role in implementation use all its powers (including planning) to increase the quality of blue and green infrastructure in the borough. The draft proposal to use a significant proportion of Firs Farm as a crematorium clearly is contradictory to this.

The development of the crematorium, its presence at the site, and its operation will all impact adversely on the current and proposed uses of the area in terms of sports and recreation, flood alleviation and biodiversity. This will also have a knock-on effect on local people's physical and mental health, and their well-being.

2. The proposal to site a crematorium at Firs Farm will undermine work to improve the community, flood alleviation and biodiversity value of the area, negating the significant public and private investment that has been made in this and compromise current plans for further improvement.

Since its inception in 2013, the Friends of Firs Farm has worked tirelessly, in partnership with Enfield Council and other third parties, to design, fund and deliver the improvements to the combined wetlands and flood storage area. This mitigates the impact of surface water flooding and diffuse urban pollution in the local area and the wider downstream catchment, it does this by storing up to 30,000m³ of flood water during extreme rainfall events, and filtering and cleaning surface water runoff that flows through the wetlands. The scheme also enhances the site for both people and wildlife. Several amenity features have been included as part of the works including a cycleway and network of footpaths, an outdoor classroom, dipping platform and several seating areas.

The overall cost of the scheme was over £1 million. Funding was secured from a range of project partners and sources, highlighting the importance and opportunities that can be realised through securing a range of funding streams. Alongside ourselves and Enfield Council, funding was provided by the Environment Agency, Thames Water Community Investment Fund), Transport for London for cycleways, the Greater London Authority's Big Green Fund and Thames21.

In 2017, the scheme was announced winner in the Canal & Rivers Trust Living Waterway Awards for the Natural Environment category.

Friends of Firs Farm, and volunteer groups from the local community organised by us, routinely contribute to the maintenance and upkeep of the wetlands, at a considerable saving to Enfield Council.



This work to improve Firs Farm further continues and we currently are working in partnership with Enfield Council and others to develop a community hub that will provide catering facilities, changing facilities for sports referees, space for community activities, and a “Changing Places” toilet. Specifically, we had detailed discussions with planning officers from Enfield Council on the siting of the community hub within Firs Farm, and the location advised is sited exactly in the area indicated in the draft Local Plan for burial/crematorium use. In July 2021, after several years working with Enfield Council to develop the proposals, Friends of Firs Farm submitted a planning application (Ref: 21/02685/FUL) for the first stage of this programme. The determination date for this application has been indicated as 15th September 2021. Discussions have also been held, and funding secured, for the implementation of the proposals from third parties such as Sports England and Thames 21, which would be supplemented by money raised from within the local community by Friends of Firs Farm.

The development of the crematorium, its presence at the site, and its operation will all reduce the effectiveness of the work done to date, and will therefore reduce the value of the significant investment of money, time, other resources and good will that the various partners working at Firs Farm have put into the project to date. By designating the area for burial/crematorium use, the longer-term future of the community hub proposal is seriously in doubt. As a result, the funding already secured from third parties is likely to be lost, and the time and resources expended in development the proposal to date will have been wasted. It seems likely that third party funders such as Thames 21 may have their confidence in Enfield Council as a trusted partner undermined.

Another likely outcome if the proposal for burial/crematorium use is confirmed in the Local Plan will be that we shall find it increasingly difficult to motivate our supporters and volunteers in helping to maintain and improve the wetlands. This will lead to additional costs for Enfield Council if the wetlands are to be maintained to current standards, and/or a reduction of the quality of the wetlands and open space, and in their value to the community.

3. The proposal is directly at odds with the Spatial Vision and Objectives of the draft Local Plan

Enfield Council’s vision for the borough states that it will be:

“A deeply green place – A place where enhanced green open spaces and waterways permeate through the urban fabric from the wild places in the rural north, providing access for all to nature on their doorstep. Improved biodiversity, greener urban environments and better air and water quality will deliver places where residents lives enriched with nature. We will successfully respond to the climate crisis through effective mitigation and adaptation, delivering sustainable buildings and transport options, and effectively managed flood risk. We will be a Borough that is carbon neutral” (draft Local Plan, page 18).



The proposal to use Firs Farm wetlands for burial/cremation will preclude enhancement of this green open space and waterway, and reduce the access for all to nature on their doorstep, as improved biodiversity, a greener urban environment and better air and water quality will be compromised. The Council will therefore be less able deliver places where residents' lives are enriched with nature. The proposal also reduces the ability of the council to effectively manage flood risk.

4. The draft Policy directly contradicts Strategic Policies SP BG1 and SP CL4 in the draft Local Plan.

Strategic Policy SP BG1: Blue and green infrastructure network in the draft Local Plan states that *"Future blue-green interventions will be prioritised ... provision of world-class sport villages at Enfield Playing Fields, Hotspur Way and Firs Farm"*. Also, Strategic Policy SP CL4 identifies Firs Farm as facilitating and contributing towards developing sport and leisure facilities in Enfield. At paragraph 12.4.4 of the draft Local Plan, the reasoned justification for Policy SP CL4 states that the policy seeks to promote and encourage sporting excellence across the borough, including the development of world-class sport villages at Hotspur training ground, Picketts Lock, Enfield Playing Fields and Firs Farm. In turn, this will:

- improve the health and wellbeing of residents, helping residents become more physically active;
- provide new sports, recreation and leisure facilities which are open to the wider community in accessible locations;
- encourage social inclusion and increased community safety and security;
- support economic growth, providing employment opportunities to local residents;
- support sustainable travel choices and links with surrounding public transport nodes;
- improve accessibility to the open countryside, nature and key attractions, including east-west connectivity through the borough;
- improve green and blue networks; and
- sustain and enhancing the significance of heritage assets and open character of the landscape.

The proposed location SA59 for burial/cremation use indicated on the Proposals Map of the draft Local Plan will result in the reduction of playing pitches available at Firs Farm.

Also, as indicated above, proposed location SA59 is also where in discussions with us on developing a community hub, planning officers from Enfield Council indicated would be a preferred location for such facilities, and would also allow for future expansion to provide changing rooms for sports teams.

Therefore, designating this site for burial/cremation use, the value of facilities for sport at Firs Farm will be reduced. The burial/cremation use will also seriously impede the opportunities to improve facilities.

5. The proposal is not consistent with the National Planning Policy Framework (NPPF)



Policies set out in the NPPF² relevant to this proposal are:

- Section 8: *Promoting healthy and safe communities* requires planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise encounter each other. These should also be safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion (e.g. through high quality public space, which encourages the active and continual use of public areas). In addition, they should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs (e.g. through provision of safe and accessible sports facilities). To provide the social, recreational and cultural facilities and services the community needs, planning decisions also should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

The proposal in the draft Local Plan to designate this area of Firs Farm for cremation/burial use will preclude the plans to develop the area for sports and community uses in line with the above policy, and therefore must be considered contrary to this.

- Section 11: *Making effective use of land* states that planning decisions should encourage multiple benefits from both urban and rural land, taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to green space.

The proposal for cremation/burial use at Firs Farm will not provide a net environmental gain, and therefore must be considered contrary to this policy.

- Section 13: *Protecting Green Belt land* is relevant as the London Plan (see below) states that the section of the NPPF on Green Belts apply equally to Metropolitan Open Land (MOL). Inappropriate development is, by definition, harmful to the Green Belt and MOL, and should not be approved except in very special circumstances. Local planning authorities should regard new buildings as inappropriate in the Green Belt and MOL, except for (inter alia) provision of appropriate facilities (connected with the existing use of land) for outdoor sport and recreation provided these preserve the openness of the MOL and do not conflict with the purposes of including land within it.

The proposed cremation/burial use at Firs Farm does not constitute the very special circumstances to warrant development on MOL. Although cemeteries and burial

² Ministry of Housing, Communities and Local Government (2021) – *National Planning Policy Framework* – Crown Copyright



grounds are identified as not inappropriate on Green Belt/MOL (Paragraph 149 (b)), crematoria are not specifically mentioned, which relates to the regulation of the cremation of human remains under the statutory Local Air Pollution Prevention and Control (LAPPC) regime. The draft Local Plan also has provided little or no evidence to support the inclusion of this proposal, either in terms of its need or how the site at Firs Farm was identified and evaluated in relation to other options. This is dealt with further below.

6. The proposal is not consistent with national guidance on the development of crematoria, and legislation governing this.

While the provision of crematoria is not specifically referenced in the NPPF, the most recent Government review of policy in this respect³ concluded that the restrictions in the 1902 Cremation Act remain appropriate to protect neighbouring dwellings and the sanctity of memorial grounds.

The 1902 Act (§5) states that no crematorium shall be constructed nearer to any dwelling-house than two hundred yards, except with the consent, in writing of the owner, lessee and occupier of such house, nor within fifty yards of any public highway. The site indicated in the draft Local Plan is situated less than 200 yards from dwellings in Barrowell Green. It is also adjacent to the public highway at Firs Lane. The proposal is therefore not consistent with national policies and legislation in these respects.

7. The proposal is not consistent with the policies of the London Plan

The current London Plan was published in March 2021⁴, and replaced the version (consolidated with alterations since 2011) published in March 2016. Together with the Mayor of London's other strategies, this must be taken fully into account in preparing Enfield's Core Strategy. The London Plan sets out the regional strategic framework for the future of Enfield over a 10 to 20 years' period.

Specific policies of the London Plan relating to the site at Firs Farm include:

- *Policy GG3* on creating a healthy city, which notes that to improve Londoners' health and reduce health inequalities, those involved in planning and development must (inter alia) plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports. The proposal to use part of the site for cremation/burial use is not consistent with this.
- *Policy S1* on developing London's social infrastructure states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. The

³ Ministry of Housing, Communities and Local Government (2019) - *Crematoria Provision and Facilities: Government Response to the Review* – April 2019.

⁴ Mayor of London (2021) - *The London Plan: The Spatial Development Strategy for London* - March 2021, Greater London Authority.



proposal to use part of Firs Farm for cremation/burial use will prejudice the development of improved sports and social infrastructure at this location, and is contrary to Enfield Council's Blue and Green Strategy.

- *Policy S5* on sports and recreation facilities states that development proposals for sports and recreation facilities should (inter alia) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities. The proposal to use part of Firs Farm for cremation and burial use will prejudice the development of improved sports and social facilities at this location, and therefore is contrary to this policy.
- *Policy G3* on Metropolitan Open Land affords this the same status and level of protection as Green Belt, and this is therefore protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. It also notes that London borough councils should work with partners to enhance the quality and range of uses of MOL. As noted above, cremation is not specifically identified in the NPPF or London Plan as a use that is not inappropriate on MOL. Enfield Council has also failed to demonstrate that this proposal would constitute the very special circumstances necessary for this proposal to be identified in the Local Plan and/or granted planning consent.

8. The evidence base and other supporting documentation published during the preparation of and alongside the draft Local Plan does not set out a clear and compelling case for proposing cremation/burial use at Firs Farm.

The process of revising the Enfield Local Plan started in 2015 with a preliminary consideration of the planning issues facing Enfield Council, and consultation on this⁵. This consultation was a broad consideration of strategic issues facing the Council. The document published made no specific references to Firs Farm or the need for new crematoria. Enfield Council then carried out a further consultation between December 2018 and February 2019⁶. This consultation considered the key issues and policy options available to the Council. Firs Farm is mentioned only in relation to the Council's "Blue Ribbon" Network, and the Council's investment in a series of projects to enhance and improve the quality of these spaces including watercourse restoration projects such as Firs Farm Wetlands and River Restoration. In respect of crematoria, the document notes that to plan for existing and future growth in Enfield, the Council will support additional burial space and crematoria to cater for the requirements of different religious groups and changing funeral demands based on an up-to-date and local identified need assessment. A draft policy GI6 on burial space and crematoria states:

"The Council will work with the religious community to inform future burial provision and will work with partners including cross boundary and sub-regional local planning

⁵ London Borough of Enfield (2015) - *Consultation on a New Plan for Enfield 2017-2032* - November 2015.

⁶ London Borough of Enfield (2018) - *Towards a New Local Plan 2036: Issues and Options* - Public Consultation (Regulation 18), December 2018.



authorities, where appropriate to identify and address the requirements of these groups and to tackle burial space shortages.

The Council will protect existing and support additional land to be used for burial space and crematoriums (sic) where:

- a) There is an identified need for the space;*
- b) It would not harm the amenity of nearby residents;*
- c) The landscape is maintained;*
- d) Associated built facilities are of an appropriate scale to their surroundings; and*
- e) There is no undue impact on the safety and functioning of the public highway.”*

(p173)

No specific sites or locations are identified in relation to where these additional facilities would be located.

In the draft Local Plan, Table 6.4: *Policy options for DM BG10: Burial and cremation space notes* that the Council’s preferred option is to meet its objectively assessed need in the urban area first and new sites in the Green Belt. This however only identifies two new potential sites to meet needs at Sloemans farm for a cemetery and at Church Street Recreation Ground for a crematorium. This would seem to imply the preference is to develop the Church Street site rather than Firs Farm, although this is not clear.

The Council’s evidence base published alongside the draft Local Plan includes a Burial Space Need and Provision Study⁷. This study concludes additional burial space is needed and identifies new potential sites opposite Enfield Crematorium, adjacent to the A10, and on land to the north west of the Borough, off Lavender Hill Cemetery. This report does not discuss cremation capacity in any respect, nor does it mention the use of land at Firs Farm for burial or cremation. There is therefore no connection between the policy set out in the draft plan and the evidence base that is supposed to support it.

The Integrated Impact Assessment (IIA) accompanying the draft plan⁸ indicates that, regarding Policy DM BG10: Burial and crematorium spaces, that the sites allocated for crematoria (i.e. Firs Farm and Church Street Recreation Ground) would have similar effects when assessed against the IIA objectives. This clearly does not properly consider the ecological and flood prevention role of Firs Farm when compared with Church Street Recreation Ground. This is also not consistent with the assessment of cumulative effects presented in Table 7.4 of the IIA document, which identifies differential effects for the two proposed sites in terms of flood risk.

The site appraisals reported in Appendix E to the IIA for Site SA59 (Firs Farm) acknowledges that the proposal would have significant adverse environmental impacts in terms of health and wellbeing, air quality, biodiversity, efficient use of land and materials, flooding and

⁷ Enzygo Ltd. (2020) - *Enfield Burial Space Need and Provision Study: Final Report* - London Borough of Enfield, September 2020.

⁸ Land Use Consultants (2021) - **Enfield Local Plan Integrated Impact Assessment: Final Report** – London Borough of Enfield, June 2021



water quality, even with mitigation. This identifies that the Firs Farm site would have greater adverse environmental impacts than site SA61: Church Street Recreation Ground, which is the other site identified for cremation/burial use. In Appendix F to the IIA, it is reported that the crematorium use proposed on Site SA59 at Firs Farm could be considered appropriate use in the Green Belt/MOL. This is incorrect, as is noted above.

Overall, Enfield Council has failed to demonstrate either the need for additional cremation capacity in the borough or that, even if such need exists, the proposed site at Firs Farm identified in the draft Local Plan is an appropriate place or the best option available when compared with the available alternatives.

9. The proposal will significantly affect the local Site of Interest for Nature Conservation, and reduce the biodiversity and nature conservation interest of Firs Farm wetlands, contrary to several other policies in the draft Local Plan.

Firs Farm Wood and Hedgerows (ID: EnB07) is designated as a Site of Importance for Nature Conservation (SINC) at Borough level. The site supports a rich habitat composition, including small areas of rare and valuable habitats on a metropolitan scale. It comprises a range of habitats including standing and running water, reedbed which is rare in London, amenity and semi-improved neutral grassland, hedgerow and woodland. Enfield Council's review of sites⁹ indicates that this site plays an important role for ecology, as well as providing significant educational opportunities. The site is borough grade quality and is therefore no change was recommended in the review to the designation of the SINC. The current management of the site was considered appropriate and it was recommended that this should continue to be implemented to maximise the benefit of the site for wildlife, as well as provide educational opportunities for people in the local area. A minor opportunity to enhance the management on site is to relax mowing regime in some areas of the site to allow for a more diverse herb composition. The surrounding fields were considered to provide a buffer of green space and protection for habitat in the SINC.

Strategic Policy SP BG2 of the draft Local Plan: Protecting nature conservation sites states that development will be expected to protect, maintain and enhance the biodiversity and geodiversity value of the borough's international, national and local wildlife and geological sites. Development affecting the integrity of a SINC will only be supported where mitigation offsets the loss of habitats and species, it protects, restores, enhances and provides appropriate buffers around wildlife and geological features as well as links to the wider ecological network and benefits of the proposed development would clearly outweigh the adverse impact on the biodiversity and geodiversity value of the site.

The site is also situated in Metropolitan Open Land. Strategic Policy SP BG1: Blue and green infrastructure network in the draft Local Plan states that proposals will be expected to contribute to the creation of a more integrated, multi-functional and accessible blue and green infrastructure network and address deficiencies in quantity, quality and access across

⁹ Land Use Consultants (2020) - **Review of Sites of Importance for Nature Conservation** - Appendix C: Summary of SINC Review, November 2020 – London Borough of Enfield.



the Borough. This will be achieved through protecting and enhancing areas of Green Belt and Metropolitan Open Land to maintain their function, quality and openness. Draft Strategic Policy SP BG4 Green Belt and Metropolitan Open Land states that Enfield's Metropolitan Open Land will continue to be protected from inappropriate development and, where possible, enhanced. Proposed development within Metropolitan Open Land should not have a significant detrimental impact on its openness respect the character of its surroundings. Positive use and management of the Metropolitan Open Land is to be supported where integrated with the wider blue and green infrastructure network and consistent with the strategic purposes of these designations.

The boundaries of the proposed location SA59 for burial/cremation use encroaches into the SINC to the northern and eastern ends of this site. The proposal will adversely affect the hedgerows and other biodiversity resources, and this may be to the extent that the justification for the SINC status is compromised. In any event, the proposal is not consistent with the stated policy aims of protecting and enhancing the SINC.

10. The proposal will have an adverse effect on local traffic, and a consequent additional impact on the local environment, and this has not been properly considered in the Integrated Impact Assessment of the draft Local Plan.

The IIA published alongside the draft Local Plan indicates that the traffic implications of the proposal to site cremation/burial use at Firs Farm have been considered as part of the appraisal applied to the site. The IIA concludes that the proposal would have a positive effect as the site is located within 350m of at least one bus stop. The site is also within 200-400m of Firs Lane, which is a Local Centre. It also concludes that the proposal will not affect the achievement of the IIA objective of a focus on delivering the 'Vision Zero' target for road safety.

This analysis clearly takes no account of the likely additional traffic that would be generated by an incinerator at this location. Firs Lane is potentially a very busy road, providing a link between the North Circular Road and the northern areas of Enfield. This conflicts with the mainly residential uses and green spaces along Firs Lane, and the presence of several schools in the area. Enfield Council has implemented several measures in recent years to discourage car traffic along Firs Lane and to encourage the use of more sustainable travel modes. For example, traffic calming measures have been implemented along much of the length of Firs Lane, and access gates have been placed just north of the junction with Barrowell Green to prevent larger vehicles travelling along it. At Firs Farm specifically, Transport for London has provided finance for the provision of cycle routes, which would be partly lost should the proposal for cremation/burial use be implemented. Most recently, the 456 bus route between Crews Hill and North Middlesex Hospital has been provided to improve public transport services.



Traffic assessments for similar types of development¹⁰ acknowledge that a high proportion of people visiting the site will do so by private car, due to the nature of crematoriums, and people from out with the local area are unlikely to walk, cycle or take public transport to travel to and from a crematorium. This source also indicates that a proposed crematorium could generate approximately 40 two-way vehicle trips per hour during the weekday development AM and PM peak periods.

The assessments reported by Enfield Council appear not to have taken this into account. Friends of Firs Farm believe that the additional traffic on Firs Lane resulting from this proposal, should it go ahead, would worsen noise and air pollution, and reduce road safety. This would also impact adversely and unacceptably on the amenity of Firs Farm, both in terms of biodiversity and enjoyment of the open spaces.

¹⁰ See, for example, Systra Consultants (2020) - *Proposed Crematorium at Barrow Green Road, Oxted: Transport Assessment – Final Report v2*, Reference GB01T18/B93/10755018, Horizon Cremation Ltd.