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**OBJECTION TO THE TWO SITES INCLUDED IN THE DRAFT PLAN FOR A NEW CREMATORIUM**

I write to raise objection to the two sites allocated for potential crematorium space in the draft local plan (6.10 pages 133-137 and 380/382) . These are **Firs Farm Recreation Ground (SA59 on page 380)** and **Church Street Recreation Ground (SA61 on page 382)**. Both sites are unsuitable for such a development. They fail policy DM BG10 3b, being not appropriately located. They fail policy DM BG10 3c as they do not demonstrate how they will deal with potential air and water pollution measures. And, if as I believe they are both Metropolitan Open Land, they also fail policy DM BG10 4 as the plan does not demonstrate that there are no suitable alternatives. My detailed objections are as follows:

- **No Consideration of Suitable Alternatives** – no suitable alternative site for crematoriums have been considered in the draft plan (the only two other sites listed are for burial). If as I believe these are both Metropolitan Open Space the council has a duty to consider alternatives which are not necessarily in the borough boundary. There is no discussion in the plan of options and it is odd that the only two sites listed are very close to each other in a residential area. Has not the expansion of the existing Enfield Crematorium been considered? Enfield Council's own report entitled *Enfield Burial Space Need and Provision Study* October 2020, which is available on its website, advises at page 73 that the Enfield Crematorium manager stated that he believed there was derelict land opposite to the entrance and Hoe Green Park to the south both of which offered opportunities for expansion. Why haven't these been considered ?
- **No Evidence of Need** – No clear evidence of need of a new cremation facility is given in the draft local plan. Indeed the *Enfield Burial Space Need and Provision Study* notes that Enfield has a much larger proportion of burials than the norm and that the pressure is for more burial space not cremation capacity (para 7.5.1). Where is the justification for a new cremation facility on either site ?
- **Loss of Amenity** – Both sites, which I understand are currently Metropolitan Open Land, are heavily used by local residents for recreation. The Church Street Recreation Ground is regularly used for football and cricket and general recreation. The Firs Farm site is also heavily used and has the wetlands site nearby which would be compromised by such a development. There is limited other recreational sites in the area, and given the density of population, it is unclear how, if at all, the recreational space will be replaced if either site is developed.
- **Unsuitability of the sites**. Both sites are situated in residential areas with schools close by. The Church Street Recreation Ground in particular abuts Latymer school and the gardens of houses adjoin the site on two sides. The operation of a crematorium on such a site will adversely impact on residents through noise, pollution and congestion and prevent the quite enjoyment of their properties. These therefore fail policy DMBG10 3b as they are not 'appropriately located'.

- **Access issues** – For the Church Street Recreation Ground plan shown access would seem only possible from the A10, unless access is cut across the field behind from Haselbury Road. Either way it would cause considerable congestion. Firs Recreation Ground has similar problems with the only possible access from the narrow-ish Firs Lane – again resulting in congestion during its hours of operation.
- **Air pollution** – Whatever steps are taken there will be an element of air pollution which must be a concern in the midst of residential sites – especially for the Church Street Recreation Ground where houses abut the crematorium site. This raises not only the prospect of interrupting residents quiet enjoyment of their properties by potential health risk which the council should take into account before including this site in the plan. They fail policy DM BG10 3c as they not demonstrate how they will deal with potential air and water pollution measures to these residential areas.
- **Heritage Considerations** – The site allocation sheet for the Church Street Recreation Ground (SA61) states that there are no heritage considerations. This is incorrect. The front of the site contains row of 50 or so mature horse chestnut trees which must be nearly 100 years old if not more. From the plans as set out this historic arbour would have to be felled which would be an act of gross vandalism.

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On the above grounds I therefore formally object to the inclusion of both sites within the draft local plan, my reasons being set out above, and request that these site are removed from the draft plan.