

To the Local Plan Team

We would like to offer the following comments on the emerging local plan.

### **Chapter 6 Burial Land**

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Policy BG10 – This is not the right approach. Approach F would be more appropriate whereby it is acceptable to plan for a shortfall of space within the borough and promote cross border expansion instead. The site identified within the Green Belt (SA60) would be the best location for both natural burial and a crematorium, as it is a more tranquil setting, also it would meet the exceptions tests of Green Belt policy, providing the building results in the openness of the Green Belt being maintained, through limited building, and on the areas where there are already some structures. This site is also sited away from residential development thereby this would not adversely impact on the amenities of neighbouring residents through pollution etc (see below). The site is also currently private land and would not result in the loss of public open space. Therefore, providing built structures are limited the best approach would be to release Green Belt land on the edge of the Borough. The intensification of burial land and especially crematoriums in suburban areas and urban areas would be an unacceptable solution.

Proposal Map SA59 – Object to this site being identified for a crematorium use for the following reasons:-

#### **Loss of Playing Fields**

Loss of playing fields contrary to both the NPPF, the London Plan 2021, Sports England advice and other policies within the Plan in relation to maintaining open space, protecting the openness of MOL land (through the introduction of associated built development) and the promotion of wellbeing for residents and biodiversity within the borough. This would also be in direct conflict to the vision of the plan. It would take away valuable public access to green open space, introduce pollution and therefore would be at odds with the vision of creating “a deeply green place”.

When the Firs Farm Wetlands were developed this involved the loss of playing field and part of the justification for the loss of these fields were that the site now identified for a crematorium use would remain as playing fields. The council’s own Playing Pitch Strategy has identified the site should be protected and enhanced. It has identified the site as being capable of being marked up to provide more pitches creating a key hub site and at a low cost. Introducing a crematorium would result in the loss of suitable land and in particular youth pitches which have been identified as being deficient in the borough. Policy CL4 has also identified the fields as facilitating and contributing towards the developments of first class, publicly accessible sporting and leisure facilities to meet the needs of the growing population. The proposal would appear to be in direct conflict with this policy.

#### **Loss of Recreational Space and Biodiversity**

The proposal would also reduce the size of the Wetlands area making it less attractive to

visitors. Some visitors may also be put off visiting the Wetlands because of the close proximity of a crematorium with its associated odour and pollution. Tennis courts have just been built immediately adjacent to the proposed site. Such a use is unneighbourly.

### **Unacceptable impact on the openness of MOL**

The proposal would be in conflict with the NPPF and the London Plan. Although burial grounds can be acceptable in the green belt and MOL the associated facilities need to preserve the openness of the Green Belt/MOL land. The introduction of a crematorium would result in the need to introduce buildings, car parking and other structures which would not preserve the openness of the MOL. The site coverage of buildings and associated infrastructure would be introduced at a location without built development, thereby introducing an unacceptable spatial impact. The site is highly visible from public viewpoints, so would result in a visually unacceptable impact too. Thus, it would result in an unacceptable level of harm to the MOL and would not preserve its openness which is contrary to policy.

In such cases very special circumstances would need to be demonstrated. The supporting information within the plan states that there is a need for burial space. Other more suitable sites would appear to be available however for various planning reasons (See below). Given other more suitable sites are available no very special circumstances appear to exist.

Furthermore, the plan has also identified a need and demand for allotments in Winchmore Hill (Policy BG9). This would appear to be a better use of the land if the playing fields are to be lost, as this would still provide a recreational use which would complement the Wetlands use.

### **Residential Amenity/ Highways Issues**

The site is located in a low PTAL rating so is poorly accessible. Winchmore School is located nearby and the roads are often congested at the start and end of the day, partly due to its poor level of accessibility. The introduction of increased traffic would add to the traffic issues. Furthermore, it would result in increased noise and disturbance to local residents, which would be detrimental to their amenities. The crematorium is also likely to increase pollution which would also adversely impact on the amenities of the nearby neighbours, users of the Wetlands, and sporting facilities nearby.

### **Other More Suitable Sites**

The plan identifies a site which is currently scrubland adjoining the existing crematorium - (SA44) The Dell. This site would not involve the loss of playing fields, or a well-used recreational facility which has been recently upgraded to partly encourage use by the community. The Dell site would provide the natural extension to the existing crematorium. It has been identified for housing growth but this should be revisited and the site investigated for a crematorium use. Given the ongoing pandemic and working patterns changing, (with more people working from home), in the future there is potential for a reduced requirement in office space. This will likely result in more windfall sites becoming available over the plan period which could accommodate the potential loss of housing on the site. As the site is also accessed from a main road via an existing access, this site would be more appropriate on highway's grounds than the existing access arrangements from the Firs Lane site.

The Church Street site, although also resulting in the loss of open space would be more acceptable as it would not lead to the loss of playing fields. It is also better located with access from the A10. Furthermore, it does not form part of an area which could provide a sports hub given its size. It also has a higher PTAL rating for accessibility.

The Sloesmans Farm site (SA60) should be used to combine the crematorium with natural burial. Although it is in the Green Belt it is a larger site, with already some built development and is not surrounded by residential uses. It would not involve the loss of playing fields or public open space which is required on the Firs Lane site.

### **Chapter 3**

3.14 The two Green Belt locations should not be included and the proposals map should not be revised to remove them from the Green Belt.

Development of these sites would be contrary to the NPPF and The London Plan. The proposal would result in inappropriate development which would be harmful to the Green Belt and would conflict with the purposes of including land within it, including preventing urban sprawl and encroachment within the countryside. The proposal would not meet any the exceptions tests stated within the NPPF or the London Plan. It is suggested that to meet housing targets that the land should be released from the Green Belt and this would amount to very special circumstances, alongside the creation of London's National Park City. This would not however amount to very special circumstances which would outweigh the harm to the Green Belt. The NPPF does not support the need for housing as a reason to outweigh harm to the Green Belt. The creation of the National Park City with the rewilding of areas does not justify or overcome introducing inappropriate development on large tracts of undeveloped open farmland that provide open views from public footpaths and create the rural character of this part of Enfield, especially in relation to Chase Park. The proposal would amount to almost 15% of the existing Green Belt being lost. It would result in exactly what the purpose of the Green Belt seeks to avoid - the urbanisation of the countryside.

In relation to the two sites the Crews Hill site would be the more suitable to develop, as it has a number of buildings already present on the sites and is near to a station. Although it's development would still be unsuitable for the number of houses proposed. It may be that some development could take place but not on the scale proposed.

In relation to the Chase Park (PL10) this is totally unacceptable. The proposal also states that the development would be at a higher density than the surrounding 1930s housing. This would exacerbate further the impact on the countryside with the development being totally out of character. Adding some cycle lanes and some walking routes for active sustainable travel does not overcome the significant harm that the development would bring. The introduction of the supporting uses and infrastructure only adds further unacceptable development into the area. The area does not need rewilding. It already has a high level of biodiversity provision. This could be further improved without the need for built development which will destroy existing habitats, important landscaped areas and trees. The proposed mitigation measures and suggesting that it will introduce sustainable living does not overcome the fundamental harm and damage that would be introduced to the area and unsustainable development that will result. The proposal is massively at odds with the overall vision of the plan for a "deeply green Enfield"

The proposal would also harm the regeneration of the east of the borough. The proposal to develop the west will take valuable investment away from the east of the borough which needs inward investment.

