

**(1) Reason why decision is being called in:**

- **The report does not make clear that a cemetery service is a discretionary service not a statutory one.**

Response:

Whilst section 214 of the Local Government Act 1972 does not require the council to provide burial space, it does permit us to provide cemeteries. However, Enfield Council has a long-established history of providing cemeteries for our residents. We are continuing to make future provision through expansion of existing cemeteries and offering more options such as the proposed natural/woodland cemetery at Sloemans Farm. Whilst not a statutory service, the cemeteries are highly valued by the community and are a self-financing service.

- **Private sector options to deliver this service are not fully considered in the report.**

Response:

Private sector options are considered in the Enfield Burial Needs Assessment 2020 and the shortfall calculations within it include private sector cemeteries. Private cemeteries have not readily shared information about current and future provision. The private sector have not stepped up at present to respond to the need for the future of the borough.

Leaving the private sector to deliver this service provides no guarantee that the identified shortfall in capacity will be met or that any new capacity that is provided by the private sector will meet the needs of Enfield residents. This is because financial considerations will be the key driver for commercial developments rather than community service provision.

The cabinet report shows that not only is there a shortfall in burial provision for the borough but that the provision of a new cemetery at Sloemans Farm will significantly help address the shortfall and is also financially viable. Therefore, there is no reason by the Council should not deliver this service.

In addition, providing significant burial capacity itself enables the Council to fully control the quality of the cemeteries provided and control the burial charges made to residents and ensure they are reasonable and affordable.

- **The seven potential sites (PT 24) are not identified in the report and therefore not evaluated to explain why Sloemans Farm was chosen as the best available option.**

Response:

The seven potential sites were considered in the business case assessment prior to the drafting of the cabinet report. These sites were:

- Land east of Holly Hill Farm

- New Cottage Farm
- Sloemans Farm
- Botany Bay
- Holly Hill Farm
- Rectory Farm (plot 1)
- Rectory Farm (plot 2)

Each site was assessed and scored on a number of criteria such as ownership, size of the site, availability, possible alternative uses for the sites, accessibility and any constraints (eg planning, environmental, heritage and conservation). The sites were then ranked according to the total score.

Land east of Holly Hill Farm and New Cottage Farm were ranked 1<sup>st</sup> and 2<sup>nd</sup> respectively. Sloemans Farm was ranked 3<sup>rd</sup>. However, rural property portfolio officers and land agents (Knight Frank) were consulted and confirmed that sites ranked 1st and 2nd have been earmarked for continued agricultural use because they are much larger than Sloemans Farm. Therefore, Sloemans Farm was brought forward and the nexthighest ranked site and very attractive for use as a burial ground.

- **The impact of the loss of agricultural output is not explained in any detail in the report.**

Response:

At present the land produces two crops per year which are rotated and include; animal feed, cereal and maize for biofuel production. The 47Ha site at Sloeman's Farm will be divided into a 23Ha burial ground and potentially a 24Ha agricultural smallholding. The soil brought onto site will improve the quality of the soil at the smallholding, with the potential to increase its value and crop yield

Full details will be obtained during pre-planning and planning stages as part of the environmental assessments required.

- **No value of future tenancy income for the next 8-10 years is given in the report so that valid comparisons can be made.**

Response:

Paragraph 32 in the cabinet report illustrates that the current tenancy income at Sloemans Farm for 47Ha is £16,450pa (or £350 per Ha). The proposed 23Ha area is therefore currently valued at £8,050pa.

Paragraph 43 of the report includes a table that uses extracted data from the Discounted Cash Flow (DCF) analysis included within the business case. It is anticipated that the cemetery will become operational in 5 years' time, by which time the lease value will have increased from £8,050 pa to £9,660 pa for 23Ha (based on an annuity increase).

The table in paragraph 43 also contains data extracted from the DCF which illustrates that the burial ground is estimated to return £253,552pa net income in the first full year that it is operational.

The table below extracts data from the DCF. It compares the anticipated income from the tenancy compared to income from the new cemetery for the first operational year of the cemetery and then operational years 8 and 10 (as requested in this bullet point) with annuity increases each year

<b>Operational Year of the cemetery</b>	<b>Tenancy income (23Ha)</b>	<b>Burial ground income (net)</b>
1	£9,660	£253,552
8	£11,096	£291,252
10	£11,545	£303,018

- **The funding from importing soil is not fully explained as to whether this is guaranteed income.**

Response:

The importing of soil cannot be guaranteed income at present but is seen as a realistic opportunity. This is based on past experience of doing this at Holly Hill Farm. Income has been estimated from, and benchmarked against, the current market. The council will seek to secure the best possible income/quality balance once planning permission is granted and while appointing a principle contractor.

The financial implications at paragraph 78 make it clear that soil income would need to fall by more than 50% before the Council would have to explore additional sources of funding to cover the development costs.

- **Over time will the income cover the cost of maintaining and running the site? There are no comparisons with similar burial grounds that have been established over some years in the report.**

Response:

Paragraph 43 of the cabinet report illustrates that the operating costs are covered as soon as 62 burials a year take place.

- **Point 21 - climate plan mentions local food. This has been ignored in this point and with the Environmental and Climate Change considerations.**

Response:

The Council has no control over which crops are grown on site. The land is not currently suitable for a wide range of food crops. This will be explored at planning stage because environmental and climate change benefits will be critical to a successful planning application. The project will aim to improve farmland to a point where greater food production may be attractive and viable.

Prior to the 20th century farming was the dominant land-use in Enfield. Most of the borough was used to supply London with various types of produce. Enfield has a

long history of market gardening. Maps from the late-19th century show extensive areas of orchards and other food growing areas which are now mostly urbanised.

Approximately 15% of the Enfield's entire land area is still used for farming, most of this is arable land with wheat being the most common crop. Information from Enfield's farmers indicates that there are no strong links between where food is grown and where it is consumed. Some of the wheat grown in Enfield is sent to a local flour mill for processing but some is transported as far afield as the East Midlands.

The whole site is 47 Hectares. If all of this site were to be used for farmland to grow wheat for flour production for example, it could provide for an estimated 1.2% of the modern-day population; which is relatively small.

- **Point 43 table says that 200 burials a year is the target number of burials. This is on a site which can cater for 38,000 eventually and even allowing for cremated remains means possibly 190 years before the site is at maximum capacity so therefore it is not necessary at this time to use a plot of land the size of Sloemans Farm – this is not explained in the report and why an area the size of Sloemans Farm is required.**

Response:

Paragraph 34 of the Cabinet report states that 24Ha will be available as a small holding while 15Ha of vacant burial land will be available as a sublet for agricultural meanwhile use. This means that initially only 7Ha of burial grounds will be used until capacity is reached.

The final design will involve planting and landscaping to replace areas of historical de-forestation. This will reduce the area available for burials subject to the final design.

Paragraph 36 also highlights there is also scope for inclusion, if required, of specific public memorials commemorating service personnel or other specific events or sectors of the community.

Paragraph 73 highlights that the site must be large enough to enable at least 75 years of operations before grave re-use on site may be required.

- **Point 47 – there is no mention in the report of where the money is coming from for the traffic, pavement work and all the extra signage that will be necessary.**

Response:

This will be explored at pre-planning stages and planning stages as the design evolves. Section 106 funding options will also be explored once a concept design is in place.

- **Point 68 – it states that previous planning history can be used to mitigate construction. The report fails to explain what exactly this means.**

Response:

Sloemans Farm had a number of farm buildings, infrastructure and hard standings that have recently been demolished. The new burial ground will be designed as much as possible to use the old development's footprint as a constraint.

- **The report fails to explain what other uses the section of the farm that will not be utilised for the cemetery can be used for now and in future?**

Response:

Paragraph 34 suggests that 24Ha may remain as a small holding with the option of adding 15Ha of unused burial grounds as a 'meanwhile' agricultural use. The aim is to preserve and improve this section of green belt but also provide a much needed and sympathetic burial ground.

Paragraph 101 lists several possible long term uses for the 24Ha not required for burials.

- **Traffic and Transportation – the site is not conducive to visitors who do not drive. The nearest bus service goes to Crews Hill via Clay Hill which is a long distance away. The bus service is only once every half an hour. Whitewebbs Lane is a single lane country road with not much space for the proposed pavement works. The problems here are simply discounted in the report yet they are fundamental to people gaining access to the cemetery.**

Response:

As stated at paragraph 47 of the Cabinet report, the proposed new cemetery will require planning permission and the application will need to be accompanied by a comprehensive transport assessment demonstrating the expected level of trip generation and identifying the measures needed to mitigate any adverse impact, including during construction. This will allow the access arrangements to the site by all modes to be considered in detail.

It was noted in the site appraisal exercise that public transport options are limited due to the location of the rural portfolio but also that the majority of funeral attendees arrive by car. However, the location is serviced currently by a bus service every 30 minutes which is not unreasonable.

- **The report also fails to mention that a council's cemetery does not have to be in the borough and why sites outside were discounted.**

Response:

Paragraphs 8, 9 and 10 of the Cabinet report illustrates that there is high demand for burial space in London and that there are large predicted shortfalls in Enfield that must be addressed.

It is very important to the Council that we enable further burial space within the borough to accommodate for 'our' residents as many residents currently travel out of the borough to access cemeteries; particularly woodland/natural cemeteries.

- **The report also fails to provide any information that provision for more cemetery space could come from private religious cemeteries; for example, the borough currently has more than one Jewish cemetery. The report fails to provide any information on whether research has been undertaken as to whether there are any plans for the further expansion of private religious cemeteries in the borough which would have an impact on whether the council needs a site as large as Sloemans Farm.**

Response:

The proposal analysed data in the Burial Needs Assessment 2020 which identified the demand and shortfalls; including the provision in private cemeteries. The proposal is specifically designed to meet these shortfalls. In addition, the EQIA assessment identifies a need to provide a facility for all.

**(2) Outline of proposed alternative action:**

Cabinet to review the decision

**(3) Do you believe the decision is outside the policy framework?**

No

**(4) If Yes, give reasons:**

**For Governance Use Only:**

Checked by Monitoring Officer for validation

Name of Monitoring Officer:

Date: