



Development Management Plan (Regulation 18 stage)

Cemetery and Crematorium Needs

June 2016

1. Introduction

- 1.1 For the Development Management Plan Regulation 18 Consultation (Summer 2016), the Council is currently considering whether to allocate site(s) for cemetery and/or crematorium provision in the borough.
- 1.2 This scoping paper provides an overview of existing facilities both in the borough and beyond that are currently used by borough residents, with evidence collected about the potential level of need over the plan period and beyond and an analysis of the possible scale of future need and how this might be fulfilled.

2. Policy Context & Legislation

National Planning Policy Framework

- 2.1 Cemeteries are only mentioned in the National Planning Policy Framework (NPPF) in reference to Green Belt policy. In this respect, paragraph 89 sets out that facilities associated with existing cemeteries would be appropriate in the Green Belt, provided they preserve the openness of the Green Belt. New cemetery provision, however, does not fall within this remit, as established by case law (see paragraph 2.4); new cemeteries are inappropriate development within the meaning of the NPPF, and as such, very special circumstances must be robustly demonstrated in order to outweigh the harm arising from the proposal to the Green Belt, and any other harm.
- 2.2 Crematoria receive no specific mention in the NPPF. Due to the legislation governing crematoria (see paragraph 2.12), their location within the urban area is highly restricted. Like new cemeteries, crematoria are an inappropriate development in the Green Belt, given that the NPPF does not make reference to them. If provision was to be made on a site within the Green Belt, and such a proposal advanced through a planning application, very special circumstances would need to be demonstrated which clearly outweigh harm to the Green Belt and any other harm. This would involve demonstrating a need for the facility, and that provision could not be made outside of the Green Belt (evident from planning case law – see paragraph 2.4).

Reigate & Banstead Local Plan: Core Strategy

- 2.3 There is no specific mention of cemeteries or crematoria within the Core Strategy, however, Policy CS12 seeks to secure delivery of the infrastructure needed to support planned growth in the borough: 'The Council will...Encourage proposals that would increase the range, improve the quality or enhance the accessibility of community and leisure...facilities in the borough.' In this respect, the need for additional cemetery space is referenced in the Infrastructure Delivery Plan, although a detailed analysis of the scale of need has not been carried out.

Planning Appeals and Case Law

2.4 Over the years appeal cases have established crucial factors that Inspectors are prepared, or not prepared, to take into account when assessing proposals for the provision of cemeteries and crematoriums, and some of these appeal cases have also helped to clarify national planning policy. Pertinent cases are listed below:

- The Inspector in an inquiry held in 2004, concerning the erection of a crematorium in the Green Wedge (Welsh equivalent to the Green Belt), the parties being Vale of Glamorgan Council v Crematoria Management Ltd (appeal reference APP/Z6950/A/03/1134272), accepted that the need for a crematorium could amount to 'very exceptional circumstances' (Welsh equivalent to 'very special circumstances'), provided that it was robustly demonstrated that there were no suitable sites outside of the Green Wedge.
- In appeal reference APP/N3020/A/07/2039505 in 2007 (Gedling Borough Council v AW Lymn), the Inspector did not accept that periods of delays in booking funerals at the most convenient times in January and February, justified need for a crematorium in the Green Belt on quantitative grounds, since the requirement for these times was related more to the convenience of travelling arrangements for dispersed family and friends. In qualitative terms, although it was recognised that unduly long journeys to distant crematoria are unattractive to mourners, it was reasonable to expect trip times approaching the recommended maximum standard. The crematorium was also considered to be situated within an unsustainable location, due to its isolated rural position, and that users would be almost entirely reliant on the car for transport.
- The factors for need and site suitability were considered relevant by the Inspector in 2008, in appeal reference APP/P0620/A/07/2058519 (Ellesmere Port v Neston Borough Council), for a crematorium in the Green Belt. When considering concerns regarding delays in obtaining services at existing crematoriums in the area, due to the lack of availability of time slots, as expressed by funeral directors, the Inspector did not consider that this was a crucial factor in itself to justify quantitative need for the proposal, given that there are many other reasons why it may take some time to arrange a funeral, such as the frequency of publication of local newspapers in which obituary notices are placed, the availability of a venue for a reception/wake and wider friends and family, as well as the capacity of funeral directors.
- The Inspector allowed appeal reference APP/W1715/A/08/2070547 (Eastleigh Borough Council v Crematoria Management Ltd) in 2008, for a crematorium in the open countryside, since the principle of need had been demonstrated, and the site was situated as close as possible to the intended catchment area, securing a sustainable pattern of development.
- The Inspector in an inquiry held in 2009, concerning the erection of a crematorium in open countryside, with the parties being Kerrier District Council (now replaced by Cornwall County Council) v Crematoria Management Ltd (appeal reference APP/D0840/A/09/2098108), agreed with the appellant that an industry standard existed by which mourners should, in most circumstances, not be expected to drive for longer than 30 minutes to reach a crematorium, and that in order to take into account

speeds appropriate for a funeral cortege, it was reasonable to apply a factor of 0.6 to normal road speeds. The 30 minute drive time was also recognised in appeal reference APP/A0665/A/12/2186911 (Chester Council v Memoria Ltd) – see below. The Inspector also considered that the evidence indicating that over 80% of funerals took place at least 7 days after death was substantial enough to support the appellant's case that a crematorium was needed by the community (totalling around 150,000).

- The Inspector accepted in an appeal in 2012 (reference APP/M1005/A/12/2188880 – Derby City Council v Memoria Ltd), for a proposed crematorium, that there was a quantitative need in terms of the number of people that the scheme would serve, and a qualitative need, in that there were unacceptable delays during winter months and that journey times were in excess of a 30 minute drive for many people.
- The Inspector recognised in an inquiry in 2013 (appeal reference APP/A0665/A/12/2186911), the parties being Cheshire West & Chester Council v Memoria Ltd, that due to the constraints arising from the particular requirements of a crematorium, it would be difficult to find a site in the built up area, and that a crematorium may be appropriate in the open countryside.
- A crematorium and cemetery in a rural area (Appeal reference APP/F2415/A/14/2211858, Harborough District Council v Co-operative Group) were permitted in 2014 by the Inspector, who accepted that almost all funerals taking place more than 7 days after death between September and April, with waiting times being 2 weeks or more, along with a substantial population of 350,000 living within 30 minutes drive of the proposal, provided a robust basis for a needs case.
- R (Timmins and Lymn Family Funeral Service) v Gedling Borough Council and Westerleigh Group Limited [2015 EWCA Civ 110], established that provision for new cemeteries does not fall within the remit of the NPPF, and as such, new cemeteries are inappropriate development within the meaning of the NPPF.
- In appeal reference APP/M3645/A/14/2224101 in 2015 (London Borough of Croydon v Tandridge District Council), for a cemetery extension to Greenlawn Memorial Park in the Green Belt, which would provide 50 years capacity, whilst the Inspector accepted that there was a need for the extension, this was not considered to overcome the harm to the Green Belt, as the Inspector did not consider that a robust enough case had been presented by LB Croydon to demonstrate that there were no other suitable alternative sites outside of the Green Belt.
- In 2015, appeal reference APP/Y2620/A/14/2227929 (North Norfolk District Council v Crematoria Management Ltd) allowed permission for a crematorium in an Area of Outstanding Natural Beauty (North Norfolk Coast Area AONB); the Inspector considered that the proposal would preserve the character of the area. Subsequently, a local action group lodged a High Court appeal against the decision in September 2015; at the time of writing, the High Court appeal case has not as yet taken place.

2.5 In summary, the following factors are borne out by the preceding appeal cases:

- New cemeteries are inappropriate development within the meaning of the NPPF, and as such, very special circumstances must be robustly demonstrated in order to outweigh the harm arising from the proposal to the Green Belt, and any other harm.
- For proposals within the Green Belt, robust demonstration of the need for the facility can amount to the very special circumstances required to justify the proposal, provided that it has also been comprehensively demonstrated that there are no alternative suitable sites outside of the Green Belt.
- Whether an argument for the need of a proposal has been fully demonstrated, is dependent on factors such as the scale of the population catchment area that would be served by the proposed facility, and the acceptability of the service (e.g. waiting times, travel distances etc) experienced by users of existing facilities.
- Generally it is accepted that mourners should not be expected to drive for longer than 30 minutes to reach a crematorium, and that to account for a more appropriate speed of a funeral cortege, applying a factor of 0.6 to normal road speeds is reasonable.
- Improving the personal preferences (which can include travel distance and time slot availability) of those using existing crematoria, does not in itself demonstrate need and warrant justification of a new facility within the Green Belt.
- Proposals should be suitably located in a sustainable location, and as close as possible to the intended catchment area.
- It may be appropriate to locate a crematorium in rural areas / open countryside, given the legislative restrictions that apply to them, reducing the possibility of their location within urban areas.
- A crematorium can be acceptable if situated within an Area of Outstanding Natural Beauty, subject to a sensitive and carefully designed scheme, as long as the need and that no other suitable sites outside of the AONB are available, has been effectively demonstrated (the outcome of the High Court appeal, however, may change this conclusion).

The Burial Act 1857 – Section 25

- 2.6 The general presumption is that buried human remains may not be disturbed without specific authority. Section 25 of the Burial Act makes it an offence to remove buried human remains without a license from the Secretary of State or, in relation to ground consecrated according to the rites of the Church of England, a faculty.

Church of England (Miscellaneous Provisions) Measure 2014 – Section 2

- 2.7 This came into force on 1st January 2015, amending s25 of the Burial Act; it clarifies that approval for exhumation is now required *either* from the appropriate consistory court *or* from the Secretary of State (previously in cases concerning consecrated ground, where reburial was within the same grave, both a faculty and license were required, since a faculty only granted remains to be removed to a different grave in consecrated ground in the same or another churchyard or cemetery i.e. not reburial within the same grave).

London Local Authorities Act 2007 & the Reuse of Graves

- 2.8 Under s74 of the Act, in certain circumstances, London burial authorities have the power to disturb human remains and reuse graves – reuse of graves is defined as lifting remains, deepening of the grave to allow for additional burials, with re-interment of the existing remains in the same grave at a lower level. However, section 74 only applies in relation to a grave where a registered right of burial interment has been extinguished by the burial authority by publishing of notice; the right can only be terminated in cases where a right of interment has not been exercised for 75 years or more, from the date of the last interment in the grave.
- 2.9 It is important to emphasise here that outside of London it is a different situation entirely, as the powers contained in the Act are not available to authorities external to London. Therefore, any application made by the Council to the Ministry of Justice for a license to reuse graves would be refused. Outside of London, the Ministry will only consider the granting of a license to lift and deepen a grave on an individual basis, i.e. at the request of an individual grave owner, or to rectify an error in connection with a particular grave.
- 2.10 As stated previously, in the case of graves in consecrated ground, such as the churchyards in the borough (many of which are closed to burials), a license from the Ministry of Justice is not required in addition to a faculty granted by the consistory court. Church of England law allows the reuse of graves on consecrated land in which there has been no burial for at least 75 years, and the faculty is granted by the Chancellor of the Diocese. However, the church regards the respectful and dignified treatment of human remains as paramount, and would require applications for faculty to demonstrate due sensitivity. The Council's Cemeteries Manager has advised that within the borough, pursuing the option of re-opening closed churchyards and the reuse of graves would be a difficult and highly controversial exercise, due to the sensitivities involved of the local community (see also section 6 further below).
- 2.11 Putting aside the reuse of graves, outside of London, burial authorities are able to reclaim graves. Graves can only be reclaimed that were purchased over 75 years ago, where the rights are yet to be exercised i.e. where no burials have taken place. The grave rights can be reclaimed by extinguishment of the existing rights by publishing of notice. In the case of graves to be reclaimed in consecrated ground, a faculty would also be required from the Diocese. Clearly, reclaiming graves offers an option absent of the controversy associated with the reuse of graves, and is explored further in section 6 of this paper.

The Cremation Act 1902 – Section 5

- 2.12 By virtue of s5 of The Act, it is illegal to build a crematorium within 200 yards (around 183m) of any dwelling house, or within 50 yards (around 46m) of a public highway (including public footpaths). Due also to the fact that a crematorium necessarily involves a relatively sizeable structure, and due to their general nature, these factors usually result in the restriction of the location of Crematoriums within the urban area.

3. Existing Provision

Provision within Reigate & Banstead Borough

- 3.1 There is currently no crematorium provision within the borough, however, the Council owns and operates three cemeteries, all located within the central part of the borough, in Redhill and Reigate. Information regarding their capacity is set out in the table below:

Cemeteries owned by RBBC – function and capacity as at November 2015

Source: RBBC Cemeteries Manager

Cemetery	Function	Capacity
Reigate Garden of Remembrance	<ul style="list-style-type: none">• Interment of cremated remains only• Individual and family plots	Less than 5 years (Currently 84 plots are available, however, new plots are being created in the existing lawn area)
Reigate Cemetery	Burial plots	No remaining capacity – closed to new burials
Redstone Cemetery	Full body burials, with areas for Muslim burials and natural burials.	<ul style="list-style-type: none">• Approximately 1,245 unused plots available (comprising 1,080 lawn graves, 50 traditional graves, 34 Muslim graves, and 81 natural burial graves).• An additional 172 graves are potentially available in the unused section of the cemetery• Graves are double depth, but occasionally the required/achievable depth is deeper.• Current capacity may range from 10 years to 15 years.

- 3.2 There are also a number of churchyards in the borough, the majority of which are closed to new burials, and some of which are maintained by the Council. Those closed to new burials are as follows:

- St John's, Redhill (maintained by RBBC)
- Emmanuel Church, Reigate
- St Bartholomews Church, Horley
- St Mary's, Reigate (maintained by RBBC)

- St Andrew's, Kingswood (RBBC provides contributions towards maintenance)
- St Peter's, Walton on the Hill
- All Saint's, Banstead (RBBC provides contributions towards maintenance). Some remaining plots for interment of cremated remains, however, capacity is unknown.
- St Peter's, Woodmansterne
- St Katharine's New Churchyard, Merstham (maintained by RBBC)

3.3 The following churchyards are open to new burials, and were contacted in December 2015 to establish the remaining capacity. The responses received provided the following information:

- St Margaret's Church, Chipstead, Hooley: Open to burials for those living within the parish and members of the congregation only. Remaining capacity of 10-15 years (average of 8 burials per year).
- St Katherine's Church, Merstham. In the majority of cases, open to burials for those living within the parish and members of the congregation only. Remaining capacity of around 25-30 years (average of 2 burials per year).
- Horley New Churchyard (St Bartholomews), Church Road, Horley. Remaining capacity of around 20-25 years (average number of burials per year unknown).

Given that churchyards are generally closed, and normally only available to those living within the parish, they therefore only make a minimal contribution to the overall supply of burial space within the borough (demonstrated by the low number of burials taking place annually at St Margaret's and St Katherine's stated above).

Provision outside Reigate and Banstead Borough

Cemetery Provision

3.4 Outside of the borough, current residual burial capacity is also relatively limited in most areas. The situation in terms of capacity for each of the surrounding boroughs and districts is set out in the table below:

Capacity of cemeteries in neighbouring local authority areas, as at October 2015

Source: Various Council websites and informal discussions with Councils

Authority	Cemetery	Capacity
Croydon BC	Greenlawn Memorial Park (situated within the area of Tandridge District Council, and comprising 20% use by Tandridge residents)	1-2 years

Sutton BC	Sutton Cemetery	40 years
	Cuddington Cemetery	Closed to new burials
Tandridge DC	Caterham Cemetery	<ul style="list-style-type: none"> • Closed for new graves • Plots remain for interment of cremated remains
	St Mary's Church, Oxted	Closed to new burials
Mole Valley DC	Dorking Cemetery	Until mid 2018
	Clandon Wood Burial Reserve (privately owned site)	MVDC has secured an agreement for residents, which provides up to 75 years capacity
Crawley BC	Snell Hatch Cemetery	Until 2017
Epsom & Ewell BC	Epsom Cemetery	Until 2017

Crematorium Provision

3.5 There are a number of crematoria outside the borough which potentially serve the borough's residents. These are as follows:

- Randalls Park Crematorium, Leatherhead (privately run facility by Dignity, situated within the area of Mole Valley BC)
- Surrey & Sussex Crematorium, Crawley (privately run facility by Dignity)
- North East Surrey Crematorium, Morden (jointly run facility by the Borough Councils of Merton, Wandsworth and Sutton)
- Croydon Crematorium, Croydon (facility provided by Croydon Borough Council)
- Kingston Crematorium, Kingston (facility provided by Kingston Borough Council)

3.6 All of the above crematoria were contacted in December 2015 to ascertain the scale of services provided, cremation plot (if offered) capacity, and the general waiting times for clients. Responses were only received from North East Surrey, Croydon, and Kingston (all being run by Local Authorities), and are summarised in the table below:

Crematorium: North East Surrey	
Annual cremations	1700 – 1800
Maximum weekly services accommodated	60
Cremation plots	<ul style="list-style-type: none"> - Communal ashes lawns where ashes can be interred - Cremated remains graves can hold up to 4 sets of ashes with 40 year burial rights - Cremation memorial plots; up to 4 sets of ashes, renewable lease for 10 years - Kerb vases; up to 2 sets of ashes, renewable lease for 7 years

	For the last five years, only 4% of clients have chosen to purchase or lease plots
Cremation plot capacity	A small number of cremated remains graves, and kerb vases, are remaining. Currently looking at installing another 3 areas for graves – additional achievable capacity unknown at this time.
Average Waiting Time	10 days, with peak periods during winter months. Both a lack of available slots as well as preference for particular time slots can cause the waiting time to increase.
Crematorium: Croydon	
Annual cremations	1700 – 1800
Maximum weekly services accommodated	114
Cremation plots	Unknown as to how many plots are provided annually, as a proportion of cremation services held at the facility
Cremation plot capacity	Unknown
Average Waiting Time	No waiting times – Hindu services can be carried out within 24 hours of booking.

Crematorium: Kingston Upon Thames	
Annual cremations	850 – 900 +
Maximum weekly services accommodated	65 weekly Monday to Friday – around 13 per day, with an option for a Saturday/Sunday opening, if required.
Cremation plots	Unknown as to how many plots are provided annually, as a proportion of cremation services held at the facility
Cremation plot capacity	Significant capacity remaining, with plans to extend capacity further.
Average Waiting Time	No waiting times – slots are offered on a first come, first serve basis.

3.7 The table below shows the number of cremations handled annually by each crematorium between 2008 and 2014.

Annual Cremations handled by Surrey & Sussex Facilities 2008 – 2014

Source: The Cremation Society of Great Britain

	2008	2009	2010	2011	2012	2013	2014
Leatherhead	2,231	2,211	2,196	2,203	2,242	2,247	1,725
Crawley	3,090	2,961	2,966	2,924	3,014	3,049	2,872
Croydon	1,789	1,720	1,776	1,751	1,761	1,660	1,728
North East Sy	1,603	1,620	1,679	1,601	1,712	1,790	1,810

Kingston	773	787	766	834	802	972	915
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- 3.8 For comparison, the average for crematoria in England over the same period is 1,646¹. Although there is no industry standard optimal capacity, it is clear that most of the facilities surrounding Reigate & Banstead are operating at a higher rate than the England average and significantly so in the case of Crawley (Surrey & Sussex) and Leatherhead (Randalls Park).
- 3.9 Whilst there are also crematoria further afield in Tunbridge Wells, Brighton (x2) and Worthing, these are unlikely to realistically serve any meaningful proportion of the demand arising in Reigate & Banstead, given the travel distances which would be involved.

4. Facilities Currently Used by Reigate and Banstead Borough Residents

Crematoriums

- 4.1 When comparing the number of cremations (set out at paragraph 3.7 above) to the number of deaths within the areas in which those facilities are located, it becomes clear that facilities locally are absorbing significant demand for cremation services from surrounding areas, including Reigate & Banstead.

Total Annual Death Rates in Surrey & Sussex Crematorium areas 2008 – 2014
Source: Office for National Statistics

	2008	2009	2010	2011	2012	2013	2014
RBBC	1,273	1,192	1,257	1,237	1,200	1,267	1,342
Epsom & Ewell	531	529	571	572	579	583	599
Mole Valley	808	844	825	805	822	812	857
Tandridge	779	751	753	767	844	836	806
Crawley	760	732	767	732	776	734	697
Croydon	2,462	2,369	2,497	2,365	2,445	2,287	2,408
Sutton	1,470	1,428	1,438	1,371	1,422	1,443	1,569
Merton	1,277	1,195	1,157	1,171	1,227	1,244	1,213

- 4.2 Taking Mole Valley as an example, the average number of deaths annually in the district between 2008 and 2014 was 825 – assuming cremation rates follow national patterns (approximately 75% of all deaths result in cremations), it could be expected that this would generate demand for around 620 cremations each year. However, over the same period, the crematorium in Leatherhead (Randalls Park) handled an average of 2,150 cremations each year, demonstrating that a significant level of demand is captured outside of the borough. This pattern is replicated for Crawley to an even greater extent, but less so for the London based facilities.

¹ The average figure for number of annual cremations handled by crematoria in England over 2008-2014 has been calculated by using County figures over the same period, provided by The Cremation Society of Great Britain.

- 4.3 When all of the crematoriums above were contacted in December 2015, they were also asked what numbers of residents from the Reigate and Banstead area were using their facilities, on average annually. Unfortunately for those that responded, this particular piece of information was not readily available in their records. In this regard, the Registrar at Surrey County Council has also been contacted, however, no response has been received.
- 4.4 Anecdotal evidence obtained from a survey carried out in June 2015, of local funeral directors, indicates that at present the vast majority of funerals comprise cremations – around 80%, and thus the demand for crematorium facilities is greater than for burial space. The responses received from local funerals directors indicates that the majority of cremation services provided for Reigate and Banstead residents are at facilities in Leatherhead and Crawley (both privately run facilities), with North East Surrey and Croydon serving the borough to a lesser extent.
- 4.5 On the basis that 80% of deaths in the borough have been dealt with by cremation, this would indicate an annual average of just over 1,000 cremations per year for the last seven years, generated by Reigate and Banstead Borough.

Cemeteries

- 4.6 Anecdotal evidence obtained from a survey carried out in June 2015, of local funeral directors, indicates that at present whilst some residents use Redstone Cemetery (approximately 120-130 burials take place each year, as confirmed by the Cemeteries Manager), due to the distance and its location in the central part of the Borough, many residents who are situated in the north of the borough opt for full body burials at facilities in adjoining areas (most notably Epsom).
- 4.7 Information obtained from the Epsom Cemeteries Registrar confirms that for the period of April 2014 to March 2015, a total of 37 burials of Reigate and Banstead residents were carried out, although this figure was likely to be higher than the norm, since the total number of burials dealt with by Epsom Cemetery for this period was 20% higher than the usual annual figure. Whilst this figure only represents a period of one year, it provides an indication that only approximately 2.7% of deaths in the borough during 2014 were dealt with by burial at Epsom Cemetery.
- 4.8 Applying cremation rates of 80% of deaths in the borough, deaths (resulting in burials at 20%) would result in an estimated annual average of around 250 per year for the last seven years, generated by Reigate & Banstead Borough. Using this assumption only approximately half of full body burials are being dealt with by Redstone Cemetery. Given that only 37 burials from the Borough took place at Epsom Cemetery in 2014, this suggests that some burials of borough residents are taking place elsewhere, however it is not known at this time at which facilities these burials are taking place, although a very small proportion are likely to have been made at existing open churchyards and others are likely to be alongside relatives in locations outside the borough.

Cost Implications

- 4.9 It should be noted that whilst facilities (both cemeteries and crematoriums) outside of the borough do potentially serve Reigate & Banstead residents, there are sometimes significant cost implications for “non-parishioners” (i.e. those living outside of the borough at time of death or non-resident for over a certain period). As an example, full body burial plot costs in Sutton cemetery are doubled for non-residents whilst at Dorking cemetery (Mole Valley), costs are trebled. Although Kingston Crematorium does not charge additional fees to non-residents, Croydon Crematorium charges fees to non-residents for the cremation of children, which is a free service provided to its residents. This situation therefore can sometimes represent a burden, both financially and emotionally, for the bereaved who are not able to bury family and friends locally.

5. Assessment of Future Need

Estimating future death rates

- 5.1 The relationship between death rates at an authority level and demand for burial space/cremation services is not necessarily direct. This somewhat reflects the fact that the location of burial is an expression of preference and this need not reflect administrative boundaries (for example there may be a desire to be buried alongside relatives outside of the borough).
- 5.2 That being said, authority level death rates provide the most robust and consistent foundation upon which to base quantitative assessments. Whilst it cannot be assumed that in and outflows of burial demand equalise in all cases, if each authority calculates and plans to meet their own needs for burial space arising from predicted deaths in their borough, then the extent and location of cross-boundary movements should be broadly planned for.
- 5.3 The foundation for this assessment has therefore been projections of numbers of deaths from two sets of population projections for the borough:
- ONS sub-national population projections 2012
 - Dwelling based population projections from POPGROUP
- 5.4 These projections combined present the likely range in the number of deaths likely to occur in the borough over the plan period and beyond, the ONS projections representing the upper-estimate and the dwelling constrained projections representing the lower end.
- 5.5 It should be noted that, over the plan period, the number of deaths predicted through both sets of projections does not deviate significantly. This is because the higher population growth projected by ONS is driven significantly by immigration of younger families (particularly in the age ranges of under 5 and 20-35 year olds), groups which typically make quite a limited contribution to the

overall number of deaths. This dynamic is demonstrated by the significant variation in the borough's "crude" death rate based on the two different projections shown in the table below.

5.6 An extract from both of the projections is shown below:

	2012	2017	2022	2027
ONS				
Population	139,900	149,500	159,200	167,900
Numbers of deaths	1,297	1,239	1,292	1,394
Crude death rate (per 1,000)	9.27	8.29	8.12	8.30
Dwelling constrained (POPGROUP)				
Population	139,890	144,070	148,610	151,420
Numbers of deaths	1,297	1,240	1,253	1,334
Crude death rate (per 1,000)	9.27	8.61	8.43	8.81

5.7 Between 2015 and the end of the plan period (12 years), the projections indicate that the number of deaths amongst the local population is likely to increase from just under 1,300 per annum to just under 1,400 per annum. Over the period, this equates to a total number of deaths in the range of 15,094 to 15,565.

5.8 Beyond 2027, the number of deaths estimated by each projection does however begin to deviate. Under the ONS projections, deaths increase annually by around 2.1% per annum whilst under the dwelling based projection, the increase is more modest at around 1.8% per annum.

5.9 In planning for burial provision, it is common to plan a reasonable distance into the future given the time taken to bring forward additional provision. As such, using the growth rates identified above, and stretching the analysis over a further 18 years (i.e. 2027-2045), the total number of deaths could range between 28,445 and 30,753.

5.10 This gives a range over the total 30 year period of between 43,539 and 46,318.

Estimating future demand for burial provision

5.11 Nationally, approximately 75% of all deaths end in cremation according to statistics compiled by The Cremation Society of Great Britain. However, evidence locally from a range of sources including the Council's Cemeteries Manager, and local funeral directors, suggests that cremation rates are higher amongst the borough's residents, with only 15-20% of the services resulting in burials.

5.12 This ratio can be applied to the total number of deaths identified above to estimate the likely number of burials which will be generated by the borough's current and future population. This is summarised in the table below:

	Number of deaths	15% burial rate	20% burial rate
Plan period (2015-2027)	High (15,565)	2,335	3,113
	Low (15,094)	2,264	3,019
30 years (2015-2045)	High (46,318)	6,948	9,264
	Low (43,539)	6,531	8,708

5.13 This suggests that, over the remainder of the plan period, the total number of burials will range between 2,340 and 3,110, equivalent to an average per annum of between 190 and 260. Over the longer 30 year period, the total number of burials will range between 6,530 and 9,260, with the average annual rate increasing to between 220 and 310 due to the change in population structure in later years.

Estimating future demand for cremations

5.14 In line with the analysis above, the assumption is therefore made that 80-85% of deaths locally result in cremation.

5.15 Based on the number of deaths, the estimated number of cremations generated by the borough's current and future population is shown in the table below:

	Number of deaths	80% cremation rate	85% cremation rate
Plan period (2015-2027)	High (15,565)	12,452	13,230
	Low (15,094)	12,075	12,830
30 years (2015-2045)	High (46,318)	37,054	39,370
	Low (43,539)	34,831	37,008

5.16 This suggests that, over the remainder of the plan period, the total number of cremations will range between 12,080 and 13,230, equivalent to an average per annum of between 1,000 and 1,100 (this is commensurate with the estimated annual average over the past 7 years in paragraph 4.5 above). Over the longer 30 year period, the total number of cremations will range between 34,830 and 39,370, with the average annual rate increasing to between 1,160 and 1,310.

6. Meeting Future Need

Full Body Burial Provision – scope for using existing facilities

Redstone Cemetery

6.1 As set out in section 3 above, Redstone Cemetery currently has 1,245 unused plots available, with an additional 172 graves potentially available in the unused area. Based on actual burial rates at Redstone Cemetery over recent years, which average approximately 120-130 per annum (approximately half of full body burials in the borough), current capacity stands at approximately 10 to 15 years. This capacity is likely to continue to meet around half of the borough's

future burial need over the current plan period to 2027 and a short time beyond, provided that demand at Redstone does not significantly increase as a proportion of the total number of deaths in the borough.

- 6.2 It is important to note that the wide capacity range in terms of years, takes into account the fact that not all burials will result in the need for a new burial plot; in some cases, burials will be accommodated through re-opening of existing plots (e.g. family plots). Graves are generally double depth, although occasionally, families request that graves have a deeper depth than this (to allow for up to 4 bodies). It is difficult to ascertain the annual average proportion of burials that are made in existing plots; national figures indicate that this can range from 20-30%. However, the Cemeteries Manager has provided figures for 2014 that indicate that of 139 burials made, only 82 new graves were purchased. Thus this demonstrates that a higher proportion than the national rate, of just over 40% of burials at Redstone were made in existing plots during 2014.
- 6.3 Concerning meeting need beyond the current plan period, the Cemeteries Manager has provided information on the potential option available for extending Redstone Cemetery. An area of woodland to the rear of the site situated in the Green Belt and owned by Reigate & Banstead Council, but which is partially within the authority area of Tandridge District Council, has the potential for the installation of up to an estimated 396 burial chambers, or 792 grave spaces. These figures may in reality be less, to account for areas where trees are to be retained. The estimated cost would be in the region of £792,000 (based on a cost of £2,000 per burial chamber), and agreement would need to be reached with Tandridge District Council.
- 6.4 Regarding whether capacity can be increased by the reclaiming of existing graves, this option does not apply to the vast majority of the site, since the cemetery only opened in 1933, and so enough time to account for the 75 year period necessary from the time of purchase of grave rights has not occurred in most cases. The Cemeteries Manager has confirmed that there are only 10 graves in the oldest part of the cemetery that could potentially be reclaimed, although further investigation is needed to ascertain when these were purchased.
- 6.5 The Cemeteries Manager has also advised that it is possible to apply for a faculty to lift and deepen public consecrated graves, where there is available depth. However, it is not known how many potential graves this would yield; it has been estimated that at best this may only be a handful.
- 6.6 It is also considered prudent to note that there are specific faith-based requirements in terms of burial, which may also impact on the remaining capacity. Certain religions, such as Islam and Judaism, proscribe cremation, whilst preferences and traditions for burial can also exist within cultures. At Redstone there are sections for Catholics, Greek Orthodox, Buddhists, and Muslims. Regarding the latter, there has been a steady increase for Muslim funerals at Redstone; however, the overall demand remains low, with approximately 3 adult burials per year over the past four years. The Cemeteries Manager has advised that additional capacity within the Muslim

section exists, with 34 further graves available, and the potential to expand next to these; this should be capable of meeting the specific needs of the residents for a number of years.

- 6.7 Whilst there may be the potential to expand the cemetery, given that the extension would be situated in the Green Belt, very special circumstances would be needed to be demonstrated to justify the proposal. Currently, since there is a remaining capacity of 10-15 years, it is unlikely that a sufficient justification could therefore be provided although the situation may change in the future, once capacity starts to diminish. If the cemetery were to be extended, given that the annual average burial rate is estimated to be between 220 and 310 over the next 30 years (see paragraph 5.13 above), and taking into account that a proportion of burials are made in existing plots, the extension would result in an estimated additional capacity of approximately 4 to 6 years, provided that approximately half of deaths in the borough continued to result in burials at Redstone. This would result in an overall capacity of 14 to 21 years, from 2015 onwards, which would not cover the entire 30 year period to 2045.

Reigate Cemetery

- 6.8 This cemetery is currently closed to new burials. The Cemeteries Manager has confirmed that grave registers indicate that approximately 150 graves across the cemetery could be reclaimed. However, further investigation is required on the ground to check if this figure is accurate, and would inevitably be a time consuming exercise, more appropriate to carry out once capacity at Redstone has become more limited. The figure does provide an indication that the reclaiming of graves at Reigate Cemetery is unlikely to yield a significant number of plots that would contribute to overall available capacity in the borough.

Churchyards

- 6.9 As identified in section 3 above, there are only three open churchyards within the borough. Horley New Churchyard has a remaining capacity of around 20-25 years. St Margaret's, Chipstead, has a remaining capacity of 10-15 years (average of 8 burials annually), and St Katharine's, Merstham, has a capacity of around 25-30 years (average of 2 burials annually); in both the latter cases, there are no plans or potential to extend the cemeteries further (it is not known if there are any extension plans at Horley New Churchyard).
- 6.10 Overall, churchyards only make a minimal contribution to the overall supply of burial space in the borough, since they are normally only available to those living within the parish, and the majority of churchyards in the borough are closed. Furthermore, based on cultural and religious beliefs, only a very small proportion of the population are likely to desire burial in churchyards. Regarding the potential re-opening of closed churchyards by obtaining faculties for the reuse of graves, the Cemeteries Manager has advised that this would be a difficult and highly controversial exercise to carry out, due to the sensitivities involved of the local community, as well as potentially those of the various

churches concerned. It is not considered, given the relatively small number of graves such an exercise is likely to yield for contribution to overall capacity, that it would be prudent politically for the Council to pursue such an option, which would inevitably involve public consultation on a wide basis.

Cemeteries outside Reigate & Banstead Borough

- 6.11 It is clear that only approximately half of the demand for full body burials is currently met within the borough, and this is by Redstone Cemetery. Although local intelligence indicates that the majority of residents in the north of the borough opt for burials at facilities in adjoining areas, most notably Epsom (to avoid excessive travel times), the actual figure of 37 burials taking place of borough residents at Epsom Cemetery in 2014 (see paragraph 4.7 above) indicates that the proportion of residents using this facility is lower than actually perceived by local anecdotal evidence – representing approximately only 15% of full body burials of borough residents in 2014.
- 6.12 Aside from burials at Redstone Cemetery, Epsom Cemetery, and a very small number at open borough churchyards, it is not known where the remaining significant proportion of burials (equating approximately to one third) are taking place. Section 3 above details current capacity at neighbouring local authority cemeteries, which is generally limited (except in the case of Sutton Cemetery, which has a capacity of 40 years). However, information has been obtained on the future extension and provision of facilities in neighbouring areas, which demonstrates that in some cases, capacity will not be constrained over the borough plan period and beyond; in February 2016, Epsom and Ewell Borough Council approved within its capital programme for 2016/17 an amount of £654,000 for a cemetery extension (further details cannot be provided for confidentiality reasons). And Crawley Borough Council recently approved a planning application in November 2015, for the provision of a new cemetery on CBC owned land in Broadfield, Crawley (Little Trees, near Tollgate Hill), which will be operational in 2017. The site is situated within the High Weald Area of Outstanding Natural Beauty (AONB), covering 4.8 hectares, and will provide capacity for up to 50 years. Phase 1 of the development is anticipated to be completed over a 10 year period, whilst Phase 2 would be completed over approximately 40 years.
- 6.13 Whilst it is not known where all burials are taking place outside of the borough, the above information does indicate that for those choosing to use neighbouring facilities, capacity is likely to be available over the immediate plan period, and over much of the next 30 years.

Full Body Burial Provision – scope for new facilities

- 6.14 As demonstrated by the above analysis, approximately half of need within the borough is met by Redstone Cemetery, and if this trend continues, current capacity at this cemetery will cover the plan period to 2027 and a short time beyond this. The extension of the cemetery could increase the current capacity from 10-15 years, to 14-21 years, however, it could only be extended if very special circumstances were demonstrated, which are not considered to be

justifiable at this time. If the cemetery was extended at some point in the future, there would still be a need for additional facilities in the latter third of the 30 year period to 2045 (approximately 2035 onwards).

- 6.15 However, the estimated capacity at Redstone Cemetery is only based on half of burials within the borough. The trends in movements which currently exist to use external facilities to the borough are likely to be as a result of a range of factors, including personal preferences (eg for natural burials or to be buried alongside relatives in locations outside the borough) or locational issues (eg proximity to alternative facilities beyond the borough boundary..
- 6.16 Furthermore, whilst there may be an element of outflow to adjoining areas, there is also equally likely to be some inflow from neighbouring areas, although the actual amount of inflow is unknown in regard to the use of existing facilities in the borough, and how this may impact on future capacity.
- 6.17 In order to address the current needs of borough residents using facilities external to the borough, one potential option would be to allocate a site for an appropriately located cemetery through the Development Management Plan. If this option were to be pursued, the presence of Redstone Cemetery in the central part of the borough suggests that a new cemetery facility would best be provided either in the northern or southern parts of the borough. As already discussed it is not known where approximately one third of full body burials have been taking place. To the north of the borough, Epsom Cemetery is used by some residents, although in 2014 only 15% of full body burials were made at Epsom Cemetery, and this figure is likely to be higher than the norm.
- 6.18 Facilities to the east in Tandridge are closed, so it is more likely that residents are using facilities to the west of the borough, or to the south in Crawley and beyond. In this regard, there may be a stronger case for locating a new cemetery in the southern part of the borough, particularly given that the neighbouring Snell Hatch Cemetery only has capacity to 2017, and the new cemetery planned at Broadfield, Crawley, would be further south of Snell Hatch, and thus a greater distance to travel to for residents.
- 6.19 In terms of the size of site for a potential cemetery, and the likely provision it could supply, the South East Counties: The Cost and Funding of Growth (2005) report indicates that it is possible to achieve around 1,730 grave plots per hectare of land. The Cemeteries Manager has confirmed that this is still the correct estimate to take, and the figure takes into account areas of planting and hard standing (e.g. paths) that may be required for a cemetery site. The figure achievable for grave plots would be variable, dependent on the topography and form of the site, and it should be borne in mind that grave plots would generally be double depth, with greater depth where this was achievable for additional burials.
- 6.20 If an additional facility was to be provided for the next 30 years to 2045, taking into account that broadly half of burials are made at Redstone Cemetery (which subject to the woodland extension, has potential capacity until 2035), and allowing for the estimated highest number of burials likely to take place over the

next 30 years (see table at paragraph 5.15 above), a broad estimate would be a requirement for a site totalling 2.5 hectares. The estimated size takes into account that up to 30% of burials may be made in existing grave plots rather than new ones, which is commensurate with the national rate.

- 6.21 Achieving an appropriate location for a cemetery in terms of compliance with planning policy would be difficult. A site of this size is unlikely to be achievable in the urban area, unless more than one site was considered for provision, and even then the identification of appropriate sites would be difficult given development pressures, as well as the resulting difficulties and additional costs in delivering service at multiple sites. Therefore, a site for a new cemetery is more likely to be located in the Green Belt or other rural location.
- 6.22 For the purposes of site allocation, the NPPF states at paragraph 83 that Local Planning Authorities should only alter established Green Belt boundaries in exceptional circumstances, through the preparation or review of the Local Plan. Policy CS3 of the Reigate and Banstead Core Strategy (adopted July 2014) makes it clear that for sites currently within the Green Belt, only in exceptional circumstances may land be removed from the Green Belt and allocated for development through the plan making process. Exceptional circumstances exist where there is both an overriding need for development in order to secure the delivery of the strategic objectives and policies of the Core Strategy (and either the development proposed cannot be accommodated on land within the existing urban area or on countryside beyond the Green Belt, or where the development of land within the Green Belt would represent a significantly more sustainable option), and where there is no or limited conflict with the purposes and integrity of the Green Belt. Given this test, it is considered that it would not be feasible to allocate a site within the Development Management Plan (which covers the period to 2027 only), since there is not an overriding need for a new cemetery as borne out by the above discussions and current evidence, and therefore the required exceptional circumstances could not be demonstrated.
- 6.23 It is considered that based on current evidence, it would be more appropriate to reconsider the need to allocate a site for cemetery provision within the next plan period once capacity at Redstone Cemetery was coming to an end. Despite the fact that currently approximately half of burials do take place outside of the borough, and that this may incur additional costs to residents, burial needs are continuing to be met by external facilities, and will continue to do so, given the plans for extensions and new facilities in neighbouring authority areas. Any new site for a cemetery within the borough in the Green Belt would also be more difficult to justify, given these additional provision plans in neighbouring authority areas.
- 6.24 As detailed in section 2 above, case law has established that in the case of planning applications, new cemeteries are inappropriate development in the Green Belt, and that the requirements for additional burial space do not necessarily outweigh harm to the openness of the Green Belt, if a robust case has not been put forwards for the consideration of alternative suitable sites outside of the Green Belt. In order to help ensure that any future planning applications received by the Council comply with national planning policy and

case law, it is considered appropriate to include a criteria based policy within the Development Management Plan; this is detailed at section 7 of this document.

Crematorium Provision – scope for using existing facilities

Reigate Garden Of Remembrance

- 6.25 As set out in section 3 above, Reigate Garden of Remembrance is for the interment of cremated remains only, with both individual and family plots offered. It has an estimated remaining capacity of less than 5 years, with 84 plots available, although the Cemeteries Manager has advised that new plots are being created in the existing lawn area. There are approximately around 50-60 interments made annually, some of which are made in new plots, whilst others are additions to existing plots (a plot can have up to 2 interments). For example, in 2014, 34 new plots were purchased, whilst 14 interments were made to existing plots, and in 2015, 34 new plots were purchased, whilst 12 interments were made to existing plots. The figures for 2014 and 2015 demonstrate that around a third of interments each year are made to existing plots in the garden.
- 6.26 In addition to the creation of new plots in the lawn area, the Cemeteries Manager has advised that it is also possible to reclaim plots. Plots are purchased for a lease period of 25 years, at the end of which families are contacted to ascertain if they wish to renew the plot. There are around 30 to 40 plots each year which come to the end of their lease period, and in many cases, families choose to renew the lease. Occasionally it also proves problematic to contact families as contact details are out of date. For these reasons, it is difficult to ascertain how many plots could potentially be reclaimed, although the Cemeteries Manager has advised that under the current exercise, 19 plots have so far been reclaimed.

Crematoriums in the Surrey & Sussex Area

- 6.27 As discussed in section 3 above, the five main crematoria outside the borough which serve residents are Randalls Park (Leatherhead), Surrey & Sussex (Crawley), North East Surrey (Morden), Croydon, and Kingston. All of these crematoria were contacted recently to obtain further information on the services they provide, however, responses were only received from the Local Authority run facilities in Morden, Croydon, and Kingston. In terms of potential future provision, the responses can be summarised as follows:
- North East Surrey – a small number of cremated remains graves and kerb vases are remaining. Currently examining the installation of an additional 3 areas for cremated remains graves. The additional achievable capacity is not known at this time.
 - Kingston Crematorium – significant cremation plot capacity remaining, with plans to extend capacity further. Details of extension were not provided.

- 6.28 Randalls Park and Surrey & Sussex are both private facilities run by Dignity, generally handling higher numbers of cremations annually than the other crematoria. In the absence of a response it is not known at this time whether there are any plans to extend these facilities, and no recent planning applications have been submitted for either crematorium.

Crematorium Provision – scope for new facilities

- 6.29 As discussed previously in section 2, crematoria are subject to restrictions from the Cremation Act 1902, and due also to their general scale and nature, these factors together make their siting within the urban area extremely difficult, which inevitably leads to many proposals within the Green Belt (as well as the countryside). Planning case law has established that in addition to demonstrating that suitable alternative sites are unavailable, the need for such a facility must be robustly verified to present the very special circumstances necessary to justify such a proposal within the Green Belt. An effective argument for need is dependent on factors such as the scale of the population catchment area of the proposal, and waiting times and travel distances experienced by users of existing facilities in the area.
- 6.30 Sections 3 and 4 identify that cremation rates are far higher than full body burial, with anecdotal evidence suggesting that the majority of cremation services are provided at Randalls Park and Surrey & Sussex, with North East Surrey and Croydon serving the borough to a lesser extent. With the exception of Kingston, crematoriums in the area also generally handle a higher number of cremations than the national average for England, with a significant level of demand captured from external local authority areas to where a crematorium may be located. Randalls Park, Surrey & Sussex, and Croydon crematoria have handled the greatest number of cremations over the past 7 years than the national average. In the case of Randalls Park and Surrey & Sussex, operating levels are significantly above national averages at around 2,000 and 3,000 cremations on average per annum respectively.
- 6.31 It should be noted that in the case of Randalls Park (see table at paragraph 3.7 above), the annual cremations figure for 2014 fell significantly to 1725, being well under the usual annual figure of around 2200 for other years since 2008. Similarly, the annual cremations figure for Surrey & Sussex was at its lowest since 2008, being 2,872 for 2014. In contrast the figures for other crematoria for 2014 (with the exception of Kingston, which has nevertheless grown significantly since 2008) were higher than the previous year. It is not known if the downward turn in cremation rates at the privately run facilities in 2014 is an on-going trend, due perhaps to rising cremation fees, or if it is simply an anomaly for that year. It certainly does not reflect the total annual death rate across the crematoria catchment area (see table at paragraph 4.1 above) for 2014, which was at its highest that year since 2008.
- 6.32 Whilst there is no industry standard for crematoria optimal capacity, it is inevitable that facilities operating at very high levels such as the above will experience greater pressure on scheduling for the bereaved. The evidence gathered in this respect over 2015, however, is mixed. As already stated, no

response was received from Dignity concerning Randalls Park and Surrey & Sussex, therefore, it is difficult to ascertain actual waiting times for these facilities. Anecdotal evidence obtained from local funeral directors in June 2015 indicates that whilst these businesses would like to see additional facilities in the borough, such as a crematorium, to address issues of travel times and additional costs for residents, only one of the responses stated that long waiting times was an issue; specifically Randalls Park, which has waiting times often of around 2 weeks due to popularity.

- 6.33 The responses received from local authority run crematoria, detailed in section 3 above, indicate that waiting times for users are only an issue at North East Surrey Crematorium, which has waiting times of 10 days during peak periods in winter months only. This was considered to be not only due to a lack of available slots, but also due to preferences for particular time slots, that would cause the waiting times to increase. Both Kingston and Croydon Crematoriums confirmed that there were no waiting times for users, with Croydon Crematorium stating that Hindu services could be carried out within 24 hours of booking. Anecdotal evidence from Kingston and Croydon indicates that in their experience, waiting times for the bereaved were caused by the lack of availability of funeral directors, and delays in the availability of other parts of the service that funeral directors provide, such as fleet cars, rather than the availability of time slots at any crematorium.
- 6.34 Turning to the travel distances that residents need to make to use existing crematoria, as discussed in section 2, it is generally accepted in appeal cases that the bereaved should not be expected to drive for longer than 30 minutes to reach a crematorium, and that to account for a more appropriate speed of a funeral cortege, applying a factor of 0.6 to normal road speeds is considered reasonable. An analysis has been carried out of the catchment area from each crematorium that falls within the 30 minute journey time, allowing for appropriate road speeds, using the isochrone method (i.e. taking account of actual road routes that mourners would take). Unfortunately, it has not been possible to exclude motorway routes from the analysis, which are unlikely to be used by mourners, due to the limitations of the software used. The maps showing this analysis can be found at Annex A.
- 6.35 The analysis reveals that the majority of the borough falls within the catchment area of an existing crematorium. Most of the lower half of the borough, up to the Redhill/Reigate area, falls within a 30 minute journey time of Surrey and Sussex Crematorium in Crawley (this is supported by the anecdotal evidence from local funeral directors gathered in 2015). Areas to the west and upper west side of the borough, including parts of Reigate, Walton-on-the-Hill, and Lower Kingswood, fall within the 30 minute catchment area of Randalls Park, Leatherhead. Areas to the north, north east, and north west, including Tadworth, Preston, parts of Burgh Heath, Nork, Banstead, Woodmansterne, Chipstead, and Hooley, fall within the catchment areas of North East Surrey Crematorium and Croydon Crematorium. This leaves a sizeable area comprising eastern parts of the borough, and some western parts, which includes parts of Redhill, Merstham, parts of Hooley and Chipstead, and parts of Kingswood, which fall outside the 30 minute journey time catchment area of

any crematorium. However, much of this area is not densely populated; the population falling outside of the catchment area of any crematorium is estimated to be approximately 19,500, which equates to only 14% of the borough's population.

- 6.36 From the analysis discussed above regarding the crematorium service that is currently experienced by residents, it is considered that it would be extremely difficult to robustly demonstrate the need for a crematorium within the borough, if one was to be provided in the Green Belt or a rural location, in order to justify the harm from such a proposal. The majority of the borough's population falls within the 30 minute catchment area of an existing crematorium, and the scale of population not falling within the catchment area is far lower than many very high figures quoted in planning appeals. It has not been possible to ascertain which crematoriums residents are using, although anecdotal evidence indicates that these are likely to primarily be Randalls Park, and Surrey & Sussex, with North East Surrey and Croydon to a lesser degree. Whilst all of these crematoriums handle far greater numbers of cremations annually than the national average (particularly in the case of Randalls Park and Surrey & Sussex), the evidence gathered regarding waiting times is not considered to be conclusive enough to demonstrate that mourners are experiencing long waiting times throughout the year, and that this is simply down to capacity issues rather than other factors involved in the process that may also delay cremation services. Indeed, Inspectors have concluded at planning appeals that addressing personal preferences of mourners, such as the desire for particular timeslots, does not in itself demonstrate need (see *Ellesmore Port v Neston Borough Council*, paragraph 2.4).
- 6.37 Nevertheless, what should also be borne in mind is that whilst the requirement to plan for actual need based on current evidence may not be appropriate, there may be growing market demand for a crematorium within the borough. Over the 30 year period to 2045, the average annual rate of cremations will increase to between 1,160 and 1,310 per year (see paragraph 5.16 above for analysis), which is likely to place further pressure on existing crematoria. Cremation rates will continue to remain high as compared to burial rates, and if residents of the borough continue to use facilities situated outside of the borough, they will also continue to be subject to additional rising costs as non-residents, in most cases.
- 6.38 The population figure within the areas of the borough currently not falling within the crematorium catchment area may also increase, due to future housing growth as set out in the Core Strategy; for example, within Area 1 (The North Downs) of the borough, much of which falls outside of the catchment area, 930 homes are planned to be delivered in the urban area over the plan period to 2027. The majority of growth, however, will take place around the main towns in the centre of the borough, with around 2,440 homes to be delivered within the urban area in Area 3 (The Low Weald), including through the Horley sectors, and 1,610 homes in the urban area in Area 2 (Wealden Greensand Ridge). Up to 1,600 homes are also planned through sustainable urban extensions within the central part of the borough, around the Redhill/Merstham, and Reigate areas. All of this growth in the longer term will place increasing

demand and pressure on neighbouring crematoriums, and is likely to increase market demand for a crematorium within the borough.

- 6.39 In order to address these issues, if a crematorium was to be provided within the borough over the plan period, the Cemeteries Manager has advised that a site of a minimum size of around 1.6 to 2 hectares would be needed, in order to allow sufficient room and layout for the provision of a chapel, the crematory machinery, car park, toilets and other necessary facilities, as well as cremation plots with suitable landscaping. Indeed, in some cases, crematorium sites can be far larger and range in size of up to 4 hectares; this is a figure quoted in the government's guidance on 'The Siting and Planning of Crematoria' (Department of the Environment, 1978 (amended 1999)). As has already been discussed, due to the restrictions of the Cremation Act (a crematorium cannot be built within 200 yards/183m of a dwelling house, or within 50 yards/46m of a public highway), and given the size of site likely to be required, the siting of a crematorium within the urban area would be difficult.
- 6.40 As discussed further above, a site within the Green Belt could only be allocated within the Development Management Plan, if exceptional circumstances could be demonstrated, but it is not considered that an overriding need could be established based on current evidence. For any future planning applications, a robust demonstration of need in the case of a Green Belt site would need to be made, and any scheme would have to be very carefully designed to minimise impact on rural surroundings. .

7. Summary, Key Findings, & Recommendations

- 7.1 As part of its work to prepare the Development Management Plan, consideration has been given to whether to allocate site(s) for cemetery and/or crematorium provision in the borough..
- 7.2 Planning policy dictates that the development of sites within the Green Belt for new cemetery, and/or crematorium provision, is inappropriate development, and only permissible if very special circumstances have been demonstrated. Planning case law has established that very special circumstances can amount to the robust demonstration of the need for a facility, and that provision could not be made outside of the Green Belt.
- 7.3 For the purposes of site allocation in the plan making process, where that site is situated in the Green Belt, the test for exceptional circumstances would need to be met to remove the site from the Green Belt and allocate it, as detailed within the NPPF and Policy CS3 of the Reigate and Banstead Core Strategy. Exceptional circumstances only exist where there is both an overriding need for development in order to secure the delivery of the strategic objectives and policies of the Core Strategy, and where there is no or limited conflict with the purposes and integrity of the Green Belt.
- 7.4 The reuse of graves requires consent either from the Church of England, or the Secretary of State. The Council does not have powers to reuse graves, since it

is situated outside of London (where burial authorities are granted such powers under the London Local Authorities Act 2007). The Church allows the reuse of graves on consecrated land where there has been no burial for at least 75 years, however, this would be a highly sensitive option politically to pursue within the Borough. The reclamation of graves, where there are no remains present and burial rights have expired, offers a less controversial alternative, but the potential contribution to current capacity from these would be very limited.

- 7.5 The Council owns three cemeteries; Redstone (which deals with approximately half of full body burials in the Borough, and has a 10-15 year capacity), Reigate (closed to new burials), and Reigate Garden of Remembrance (less than 5 years capacity), which are situated in the central part of the borough. There are no cremation facilities located in the borough.
- 7.6 There are a number of churchyards in the Borough, however, the majority of these are closed to new burials, and those that are open (St. Margaret's Church, St Katherine's Church, and Horley New Churchyard) only make a minimal contribution to available burial space.
- 7.7 Borough residents are using cemeteries (such as Epsom), as well as cremation facilities (mainly Randalls Park, Leatherhead and Surrey & Sussex, Crawley), outside of the borough, which are sometimes subject to higher costs as non-residents. Whilst residual burial capacity is currently limited at cemeteries situated outside of the borough, there are plans for additional burial provision in some neighbouring authority areas. Whilst long waiting times for services at crematoriums have been reported, the evidence gathered regarding this is mixed, and indicates that other factors may be the cause of delays, rather than necessarily capacity issues.
- 7.8 The analysis for future death rates shows that over the remaining plan period and beyond to 2045, the total number of deaths within the Borough will range between 43,539 and 46,318.
- 7.9 Cremation rates are far higher than burial rates – the national figure states that cremation rates form 75% of deaths, whilst burials total 25%. This proportionality is reflected at the local level, with anecdotal evidence indicating that up to 80% of funerals comprise cremations. This produces total figures of a range of between 6,530 and 9,260 for full body burials (an average annual rate increase to between 220 and 310), and 34,830 and 39,370 for cremations (average annual rate increase to between 1,160 and 1,310) over the period to 2045.
- 7.10 Regarding full body burial provision, there is scope to extend Redstone Cemetery in an area of woodland to the rear of the site, which is situated within the Green Belt. This would additionally provide 792 grave spaces, and result in an overall capacity of 14 to 21 years (which factors in a 30% proportion of burials being made in existing plots in line with the national figure), to beyond the current plan period to approximately 2035, based on Redstone continuing to meet half of full body burial demand in the Borough. However, given that the

cemetery has a current capacity of 10-15 years which covers the current plan period, it is not considered that very special circumstances could currently be demonstrated to justify the extension within the Green Belt. Due to planned additional burial provision in neighbouring authority areas, it is likely that those choosing to use facilities external to the borough will have their needs met over the plan period.

- 7.11 Regarding crematorium provision and the service currently experienced by Borough residents, an isochrone mapping analysis reveals that 19,500 people, amounting to only 14% of the Borough's population, falls outside of a 30 minute journey time to existing crematoriums. The evidence gathered concerning waiting times is not considered to be conclusive enough to demonstrate that mourners are experiencing long waiting times throughout the year, and that this is simply down to capacity issues rather than other factors involved in the process that may also cause delays.
- 7.12 Current evidence demonstrates that there is not an overriding need for either new cemetery or crematorium provision at present within the Borough, and therefore, it would not be possible to demonstrate exceptional circumstances in order to justify the removal of a site from the Green Belt for allocation within the Development Management Plan.
- 7.13 It is recommended that in order to address the requirements for any future planning applications submitted to the Council, since these are most likely to comprise sites situated within the Green Belt, and to address other potential issues arising with such proposals, that a criteria based policy be included in the Development Management Plan. Planning permission would only be granted in future if very special circumstances were robustly demonstrated at the time of the application. Suggested policy wording is detailed below:

Policy CEM1: Cemetery and/or Crematorium Provision

1. The Council will support applications for new cemeteries and crematoriums where proposals meet the following criteria:
 - a. The site should have a good means of access from roads and should be located near transport nodes.
 - b. Proposals providing burial and/or cremation plots, should not be located in areas at risk from any type of potential source of flooding.
 - c. Proposals providing burial and/or cremation plots, should not be situated within a Groundwater Source Protection Zone, or in areas where there is known evidence of high water tables that would affect the depths required for burial and/or cremation plots.
 - d. Where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will be required.
 - e. The proposed development would not have an unacceptable adverse impact on biodiversity, or geological assets.

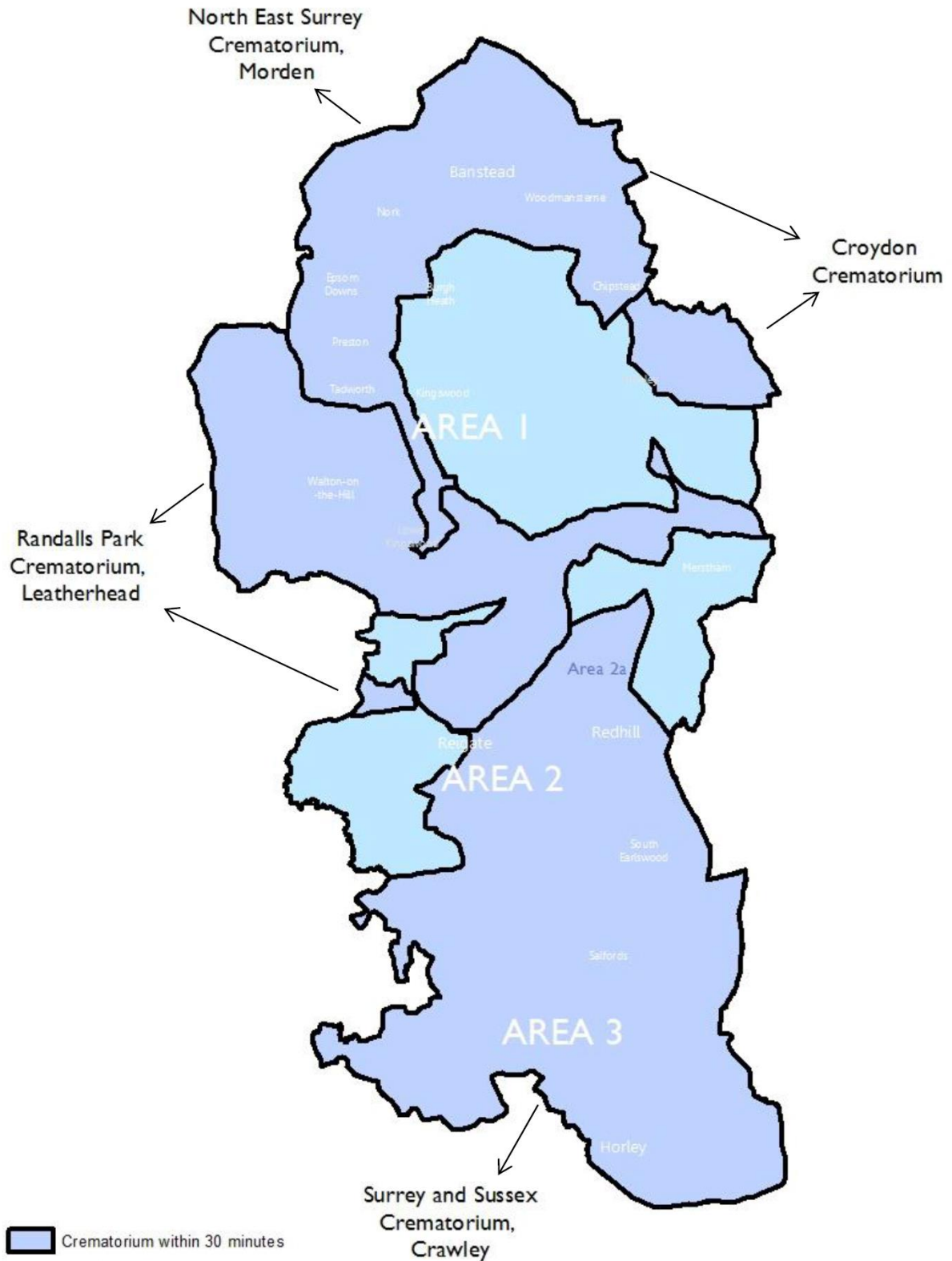
- f. The proposal would not have an adverse visual impact on the landscape character of the area.
 - g. The proposal would not have a harmful impact on the amenities of neighbouring occupiers, by reason of noise, pollution, privacy, and visual obtrusiveness.
2. Proposals for new cemeteries/crematoriums situated in the Green Belt will only be supported if very special circumstances are demonstrated, and any associated ancillary facilities should be kept to a minimum, to limit the impact on the openness of the Green Belt.
Justification of very special circumstances should include, but not necessarily be limited to, all of the following:
 - a. A robust demonstration of need for the facility.
 - b. A comprehensive demonstration that there are no alternative suitable sites outside of the Green Belt.
 3. Proposals for crematoriums will be expected to meet the requirements of The Cremation Act 1902 (Section 5), in terms of the siting of the crematorium.

Reasons: A new cemetery/crematorium facility should be situated within a sustainable location, and have good access to the road network as well as transport nodes such as bus routes, in order to enable ease of access for mourners and visitors. As well as the usual planning considerations, given the nature of this type of development specific consideration will need to be given to the level of flood risk, groundwater, contamination issues and any existing land contamination, and (as appropriate) the requirements of The Cremation Act 1902. Whilst the National Planning Policy Framework lists facilities for (existing) cemeteries as being potentially acceptable in the Green Belt, planning case law has established that the presumption for new cemeteries should be that these are inappropriate development in the Green Belt. Therefore, a new cemetery or crematorium will only be permitted in the Green Belt if very special circumstances can be demonstrated; planning case law has established that a robust demonstration for need can amount to very special circumstances, provided that it has also been demonstrated that there are no alternative suitable sites outside of the Green Belt for the proposal.

Annex A

Crematorium Catchment Area Analysis

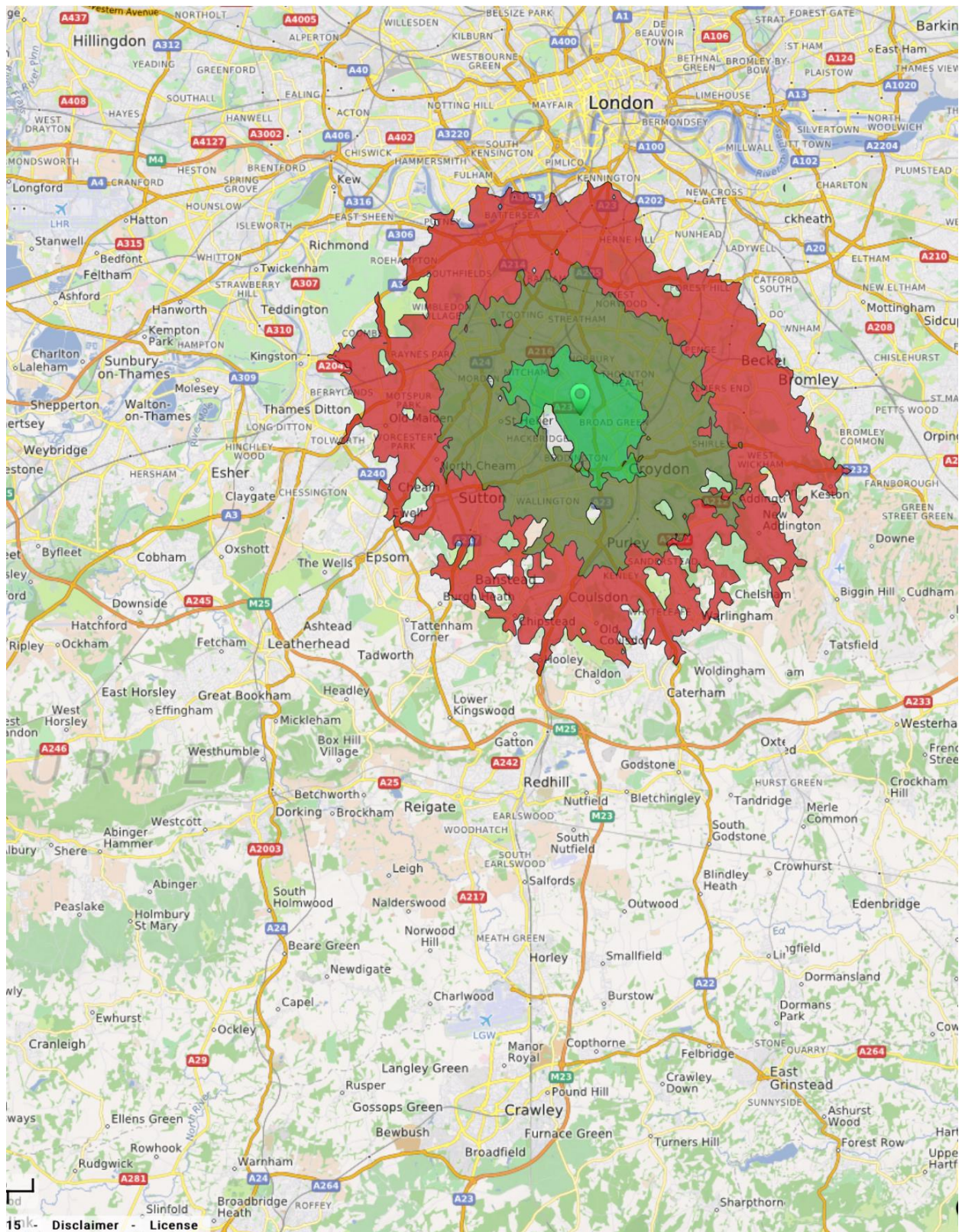
AREAS OF REIGATE & BANSTEAD BOROUGH FALLING WITHIN A 30 MINUTE CATCHMENT AREA OF EXISTING CREMATORIA



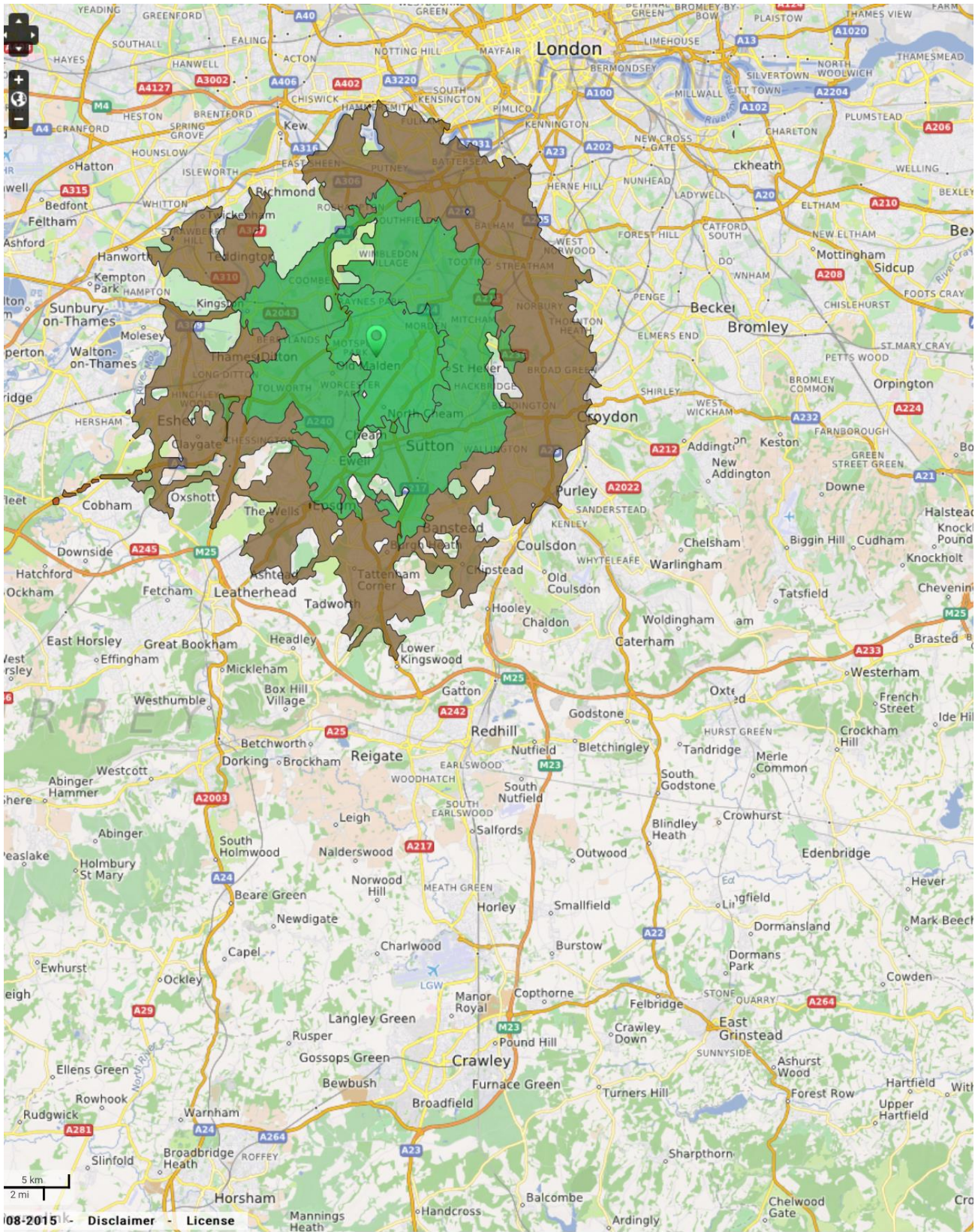
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CROYDON CREMATORIUM

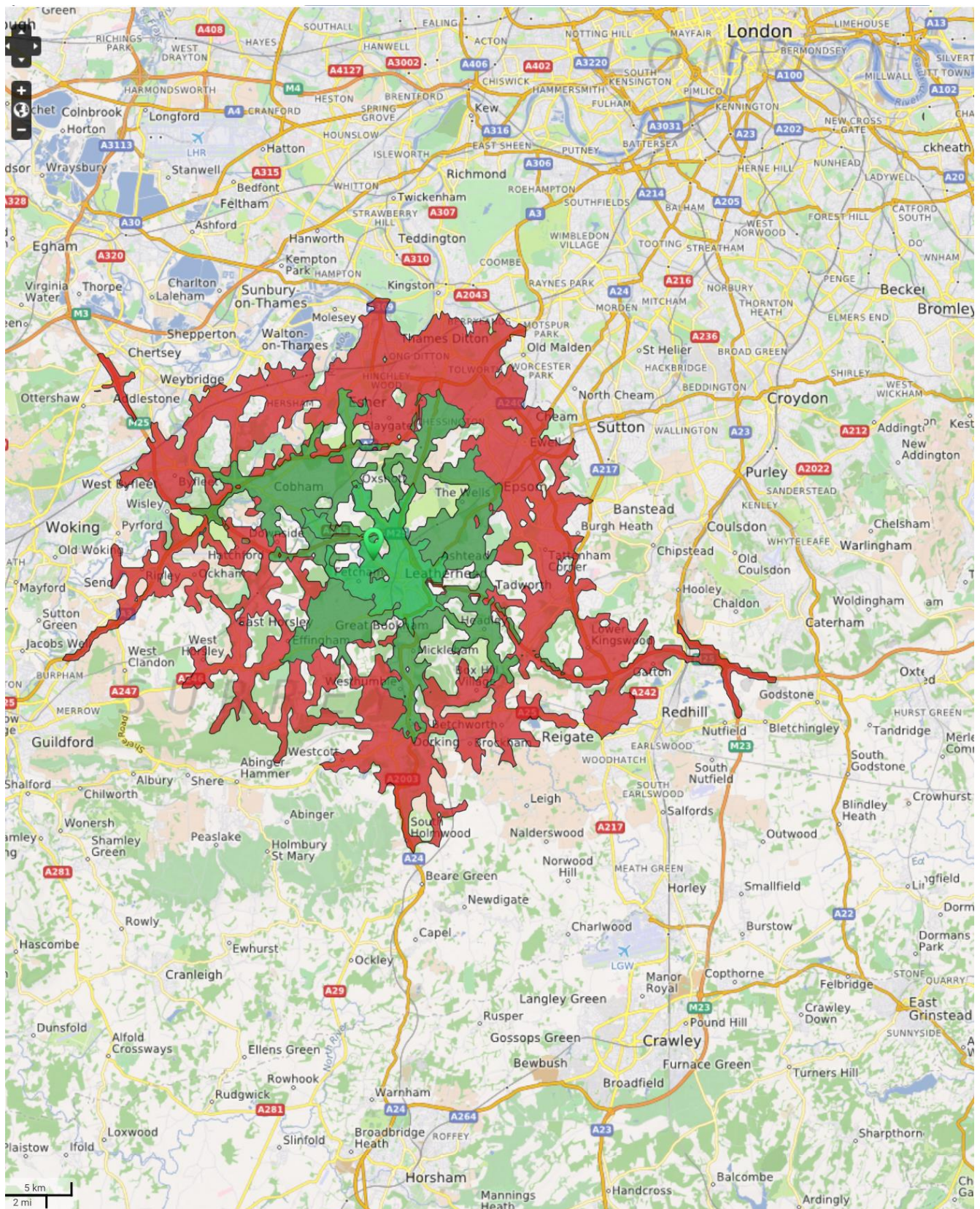
EXTENT OF 30 MINUTE JOURNEY TIMES INDICATED BY RED AREA



NORTH EAST SURREY CREMATORIUM, MORDEN **EXTENT OF 30 MINUTE JOURNEY TIMES INDICATED BY BROWN AREA**



RANDALLS PARK CREMATORIUM, LEATHERHEAD
EXTENT OF 30 MINUTE JOURNEY TIMES INDICATED BY RED AREA



SURREY & SUSSEX CREMATORIUM, CRAWLEY
EXTENT OF 30 MINUTE JOURNEY TIMES INDICATED BY BROWN AREA

