



Nathaniel Lichfield  
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Planning. Design. Economics.

**Croydon Burial Land  
Need and Provision Study**

**Main Report**

London Borough of Croydon

September 2010

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## Executive Summary

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This Croydon Burial Land Need and Provision Study has been prepared by Nathaniel Lichfield and Partners for the London Borough of Croydon to inform the Council's new Local Development Framework. The purpose of the study is to provide the requisite evidence base to underpin future planning policy and site allocations within the Local Development Framework Core Strategy and Site Allocations Development Plan Document as they relate to burial land need and provision.

The study establishes and reviews burial trends and the policy framework; assesses burial need, including specific religious requirements, to 2031; it identifies options to meet this need; and provides both initial and detailed assessments of the options. The policy review and consideration of existing burial provision in LB Croydon provide the context to the study.

Past burial trends and future predictions on population and burial rates indicate that there is a quantitative burial need in the Borough to provide for around 10,000 burials (6,500 full body burials and 3,500 burial cremated remains) or 500 per year, for the next twenty years.

The identification of options to meet this need included a targeted consultation process and consideration of opportunities for joint Local Authority working. The potential options identified include; intensification, extension to existing sites and development of new sites.

Desktop analysis identified 10 potential extension sites to existing cemeteries and 126 potential new sites. A first sieve of feasibility and deliverability reduced this to 3 and 31 respectively and a second sieve to 3 extension and 6 new sites.

The detailed options assessment of these 9 sites against planning context, transport, accessibility, site condition, site character and sustainability considerations, found 4 sites to be potentially suitable for burials use.

Three are new sites; namely land at Cane Hill south, Fox Lane/Coulsdon Road, and Kent Gate Way. The fourth site is an extension to Greenlawn Memorial Park. Land at Kent Gate Way is identified as the preferred option, largely due it being most proximate to the area of need and the most accessible.

It is therefore recommended that the need is met by:

- 1 Developing land off Kent Gate Way as a new burials site, subject to detailed hydrology and archaeology investigations;
- 2 Continuing to reclaim graves and exploring the potential of reusing graves; and
- 3 Exploring the possibility of a post 2018 extension to the Bandon Hill cemetery with LB Sutton.



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## Glossary

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### **Legislation**

Crematorium Act 1902

Crematorium Act 1952

Local Government Act 1972

Greater London Council (General Powers) Act 1976

London Government Act 2000

London Local Authorities Act 2007

### **Planning Policy**

Planning Policy Statement 4: Planning for Sustainable Economic Growth 2009

Planning Policy Statement 5: Planning and the Historic Environment 2010

Planning Policy Statement 9: Biodiversity and Geological Conservation 2005

Planning Policy Statement 12: Local Spatial Planning 2008

Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation 2002

London Plan: Consolidated with Alterations Since 2004

Consultation Draft Replacement London Plan 2009

Planning for Burial Space in London: Policies for Sustainable Cemeteries in the New Millennium (London Planning Advisory Committee in conjunction with Confederation of Burial Authorities and the Institute of Burial and Cremation Administration, 1997)

LB Croydon Unitary Development Plan 2009

LB Croydon Core Strategy Issues and Options Consultation Document 2009

LB Croydon Sustainable Community Strategy 2008-2011

LB Croydon Draft Open Space Strategy 2005-2010

London Borough of Croydon, Habitat Action Plan: Cemeteries and Churchyards

LB Sutton Unitary Development Plan 2003

LB Sutton Emerging Site Development Policies 2009

Tandridge Local Plan 2001

## **Other Resources**

Faiths Together in Croydon (Croydon Voluntary Action and Croydon Council 2008)

Ward Level Demographic Projections (Greater London Authority Round 2009)

Pandemic Influenza Guidance for Commissioners and Providers of Social Care (Department of Health 2009)

Burial Law and Policy in the 21st Century: the Needs for a Sensitive and Sustainable Approach: Consultation Paper (Home Office 2004)

Burial Law and Policy in the 21st Century; The Way Forward (Home Office 2007)

Eighth Report: Cemeteries (Select Committee on Environment, Transport and Regional Affairs 2001)

Burial Grounds, the Results of a Survey of Burial Grounds in England and Wales (Ministry of Justice June 2007)

Note on the 'Re-use of graves' (House of Commons Homes Affairs Section 2009)

Ancient Woodland Standing Advice (Natural England 2009)

Guide for Burial Ground Managers (Department for Constitutional Affairs 2005)

## 1.0 Introduction

- 1.1 This Croydon Burial Land Need and Provision Study has been prepared by Nathaniel Lichfield and Partners (NLP) for the London Borough of Croydon to inform the Council's new local Development Framework (LDF). The purpose of the study is to provide the requisite evidence base to underpin future planning policy and site allocations within the LDF Core Strategy and Site Allocations Development Plan Documents (DPDs) as they relate to burial land need and provision.

## Background

- 1.2 Like many London Boroughs, LB Croydon is now facing a challenge with regards the disposal of the dead, with only one of its three cemeteries (Greenlawn Memorial Park) currently offering new plots. The remaining two cemeteries within the Borough at Queen's Road and Mitcham Road have been full since 2005, and like Bandon Hill Cemetery which is located in LB Sutton and is jointly managed with Sutton Council, can only now offer reclaimed graves.
- 1.3 Accordingly, and as supported by national and strategic planning policy, Croydon Council has recognised the need to assess the extent of existing and future burial space provision to meet the future needs of its residents.

## The Study

- 1.4 The study, undertaken to a methodology prepared in response to the LB Croydon Project Brief, comprises of five key stages:
- 1 Stage 1 Establish burial and cremation trends, legislation and policy framework and the existing burial provision within LB Croydon.
  - 2 Stage 2 Identification of burial need including specific religious requirements, informed by key stakeholder consultation.
  - 3 Stage 3 Identification of options to meet the identified burial need.
  - 4 Stage 4 Initial and detailed analysis of the options considered capable of meeting the need.
  - 5 Stage 5 Conclusion and recommendations clearly setting out the preferred option(s) to meet the need.

## Report Structure

- 1.5 Based on the five stages set out above the structure of the report is as follows:
- Chapter 2 reviews burial and cremation provision and trends.
  - Chapter 3 provides an overview of the legislative and policy framework for considering burial space provision.
  - Chapter 4 outlines the current burial provision within LB Croydon.

- Chapter 5 reviews the stakeholder consultation process and responses.
- Chapter 6 examines the need for future burial land provision.
- Chapter 7 identifies options to meet the identified burial need.
- Chapter 8 examines the potential of intensifying the use of the existing cemeteries to meet the identified need.
- Chapter 9 examines the potential of using extensions to existing burial sites to meet the identified need.
- Chapter 10 examines the potential of new site to meet the identified need.
- Chapter 11 undertakes a detailed analysis of sites identified in Chapters 9 and 10 of the study.
- Chapter 12 conclusions and recommendations.

## 2.0 **Burial and Cremation Provision and Trends**

- 2.1 To inform the later stages of the study this chapter provides a brief overview of cemetery provision, burials and cremations within England and Wales, future predictions and specific religious requirements.

### **Burials**

- 2.2 Until relatively recently there has been little or no information on the number or operational status of the country's burial grounds, cemeteries and churchyard. As a consequence the Ministry of Justice (MoJ), previously the Home Office carried out a survey of burial grounds within England and Wales.
- 2.3 The MoJ report, entitled Burial Grounds – The results of a survey of burial grounds in England and Wales, was published in 2004. Responses relating to over 9,700 burial grounds were received. Whilst the study states that there is no completely reliable way of estimating the degree of coverage that was achieved as there is no accurate record of burial sites within England and Wales, the MoJ estimates that the survey has covered somewhere in the region of 60% of overall burial capacity. Within London the coverage of Local Authority facilities was considered to be higher at around 82%.
- 2.4 The key findings of the MoJ report on Local Authority burial provision are set out below:

### **Operational Status**

- 2.5 Based on the MoJ survey, approximately 76% (1,480) of the Local Authority burial grounds across England and Wales are open for new burial, with 12% (238) open only for burials in existing graves and 12% (232) closed to new burials<sup>1</sup>.
- 2.6 Within London, the picture differs from that nationally. The survey results indicate that there is already considerable pressure on existing burial facilities with only 60% (65) open for new burials. Potentially as a result of this, a higher proportion when compared to the national picture of the local authority facilities within London offer burial within existing graves (27%, 35). In terms of closed Local Authority burial sites within London this is in line with the national average.

### **Usable Burial Space**

- 2.7 Approximately 1,757 of the 2,031 Local Authority burial grounds surveyed classified and quantified their burial land. Based on the Local Authorities who responded there is approximately 5,378 hectares of Local Authority burial land

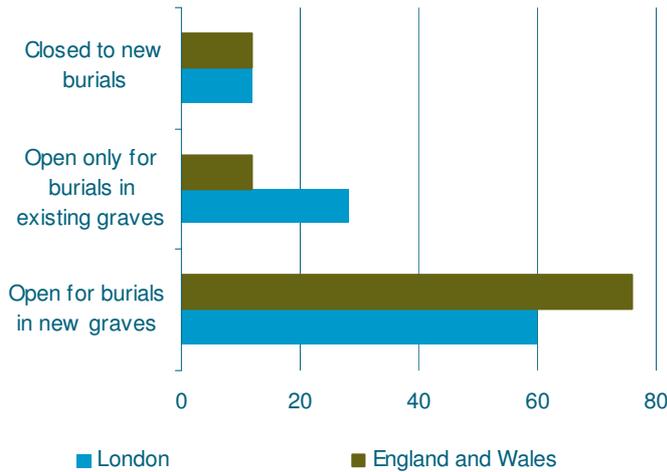
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<sup>1</sup> Excludes survey responses where no information was provided

within England and Wales; around 80% (4,298 ha) is occupied by graves, with 20% (1,079 ha) not yet used but reserved for burials<sup>2</sup>.

2.8 In line with the high proportion of burial grounds within London that are closed to new burials, London has the smallest proportion of land out of all the regions available for new burials<sup>3</sup> (14%, 88 hectares). A comparison of the London situation to that in England and Wales as a whole is shown in the bar chart below.

Figure 2.1 Unused Burial Land as a Proportion of Useable Burial Grounds within each Region



### Future Period of Operation

2.9 The MoJ questionnaire asked for information on the expected number of years remaining before any land that was available for burials but not yet used would be filled by new internments. The survey indicates that the average predicted remaining period of operation for Local Authority burial grounds is 45 years; the figure for London is 37 years. However, these figures do not reflect the more local level variations where pressures on burial space may be more acute.

### Number of Burials

2.10 Based on the survey data, nearly one million burials took place within England and Wales within the 10 years preceding the survey (1992-02). The large majority (77%, 761,500) were within Local Authority facilities. Within London this increases to 95%.

<sup>2</sup> Note plots of land set aside for the burial of cremated remains are not included in the analysis

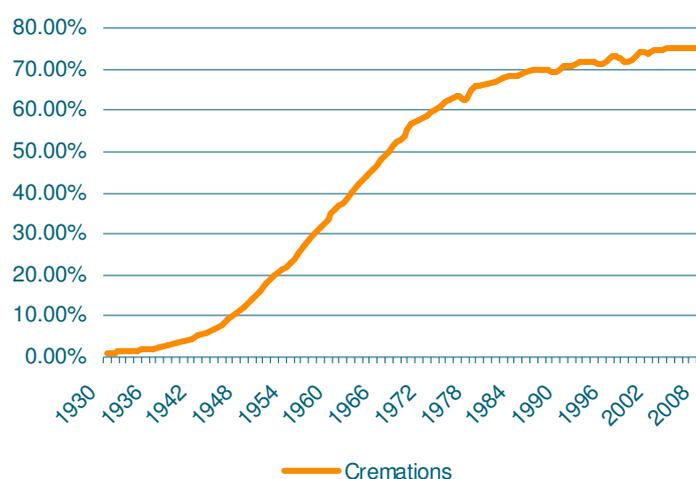
<sup>3</sup> Excludes land used for burial in existing graves

## Cremations

2.11 Less information is available on cremations. Based on the statistics published by the Cremation Society of Great Britain, the 2008 cremation level of England and Wales is 75.2%.

2.12 The cremation rate in England and Wales have grown steadily since the war from a low base and now appears to be stabilising, as illustrated by the graph below. However, as set out in para 2.13 below there is a possibility that cremations may decrease.

Figure 2.2 Percentage of Bodies Disposed of by Cremation Since 1930



## Potential Predictions - Anecdotal Information

2.13 During the course of the study we have spoken to a number of individuals within the industry including the Head of Croydon Bereavement Services about the potential future changes to burials and cremations. Whilst, we cannot back these predictions up with statistical evidence, we consider that it is important that these opinions are captured. As a result we have summarised the key points below:

- 1 There is a potential for cremations to decrease due to the growing awareness of environmental issues associated with this method of disposal;
- 2 There is the potential for burials to increase due to the potential decrease in cremation and the growing popularity of natural burials;
- 3 There is a growing acceptance of the use of re-claimed graves within London as a result of the limited new grave supply; and
- 4 The size of burial plots may need to increase due to the growing popularity of larger American style caskets.

## Specific Religious Requirements

2.14 In order to plan for future needs, it is important to understand the specific religious requirements. The table below therefore sets out the standard methods of disposing of the dead for the main religious groups.

Table 2.1 Religious Requirements for Disposing of the Dead

Religion	Method of Disposal	Specific Requirements
Buddhism	Burial or cremations according to local traditions	-
Christianity	Either burial or cremation	-
Islam	Always burial	Body buried facing Mecca. Preferred to be located within segregated area.
Judaism	Burial as soon as possible in simple coffins. Some non-orthodox Jewish communities permit cremation	Service to take place in designated Jewish burial grounds.
Hinduism	Cremation as soon as possible with the exception of children under three who are buried	-
Sikhism	Cremation as soon as possible	-

Source: NLP Analysis

## Summary

2.15 The MoJ report indicates that within London there is increased pressure on Local Authority operated burial facilities when compared to the picture nationally. This situation combined with the potential increase in burial numbers may lead to potential shortages in the future.

2.16 In relation to cremation levels these have grown steadily post World War II and now appear to be stabilising. However, this level may decrease due to the growing popularity of natural burials.

2.17 In planning for burial requirements it is essential to plan for specific religious requirements in particular the Islamic and Jewish communities.

## 3.0 **Legal and Planning Policy Framework**

3.1 This chapter of the report summarises the legal framework in relation to burials and the relevant national, regional and local planning policy.

### **Burial Law**

3.2 There is currently no statutory duty upon Local Authorities to provide burial space for residents; such provision being a matter of discretion by relevant Local Authorities or other parties in light of historical provision or market demand. There are, however, a number of Acts which provide Local Authorities with various legislative powers relating to burial land provision.

3.3 The Local Government Act 1972, recognises Local Authorities as burial authorities under the Act along with the Cremations Acts of 1902 and 1952 (Section 214 (1) and (5)). It allows burial authorities to provide and maintain cemeteries inside and outside of their administrative areas (Section 214 (2)) and to contribute towards any expenses incurred by third parties in providing or maintaining a cemetery in which the residents of the authority's area may be buried (Section 214 (6)).

3.4 More wide ranging, the Local Government Act 2000 confers on Local Authorities a power to do anything which they consider is likely to achieve the promotion or improvement of the economic, social or environmental well-being of its area (Section 2 (1)).

3.5 Since 1976, London Authorities have also had the jurisdiction to reclaim graves under certain conditions. Section 9 of the Greater London Council (General Powers) Act 1976, for instance, provides for the use of existing graves (where existing human remains would not be disturbed) in circumstances where they have first extinguished a registered right of interment. The Act stipulates that the burial authority is not entitled to extinguish any rights of interment until at least 75 years after the last burial in the grave, and after having first made efforts to notify the holder of the right of interment, allowing objections to be made. Where an objection is made by the holder of the right of interment, the burial authority may not extinguish any interment rights. Where any objection is made by another party (permitted under the Act), the interment rights may not be extinguished or removed without the consent of the Secretary of State for the Environment, Transport and the Regions [now the Department for Communities and Local Government].

3.6 Section 74 of the London Local Authorities Act 2007 now also provides London Local Authorities with the ability to re-use burial grounds in accordance with the provisions set out in the Act. Different to the Greater London Council (General Powers) Act 1976, this provision allows a burial authority to disturb human remains for the purpose of deepening the grave to facilitate further burials in the same plot. S74 only applies in relation to a grave where a registered right

of interment has been extinguished by the burial authority under the 1976 Act. Any disturbed remains must be reinterred in the same grave.

- 3.7 Section 74(4) sets out the procedure which must be followed by a burial authority wishing to re-use a grave where its remains would be disturbed (i.e. to 'lift and deepen' to provide for additional and potentially ongoing burials in the same plot). These are generally the same as required by the 1976 Act provisions excepting that under the 2007 Act only registered owners or relatives of the person whose remains are proposed to be disturbed, can lodge objections. Furthermore, if an objection is made by the registered owner of the right of burial, or the registered owner of a tombstone which is to be removed, or by a relative of the person whose remains are proposed to be disturbed, then the burial authority is not able to exercise its powers under the Section for a period of 25 years.
- 3.8 Churchyards are burial grounds associated with an identifiable church building. Some churches have also established extensions and detached burial grounds to provide additional space. Many of these 'church gardens' have since been turned into public gardens. Once a Church of England burial ground has reached capacity and is closed for any future burials, the space remains 'consecrated' i.e. holy ground lying within the jurisdiction of the church. The maintenance of Church of England churchyard can be transferred to the Local Authority through an "Order in Council".
- 3.9 The majority of cemeteries are interdenominational burial grounds in municipal or private ownership found outside the confines of a religious meeting place. Within these, parts can be consecrated for use by adherents to the Church of England and other parts reserved for the exclusive use of other religious groups.

## National Planning Policy

- 3.10 Planning Policy Statement 12: Local Spatial Planning PPS12, 2008) sets out government policy on Local Development Frameworks. It explains 'what local spatial planning is, and how it benefits communities'. It also 'sets out what the key ingredients of local spatial plans are and the key government policies on how they should be prepared' specifying that it 'should be taken into account by local planning authorities in preparing development plan documents and other local development documents'.
- 3.11 PPS12 requires a plan-led approach to land use planning and decisions, with policies and plans informed by a robust evidence base. The most important spatial planning document at a local level is the Core Strategy which forms part of the Local Development Framework (LDF). All Local Authorities are required to produce a Core Strategy that is 'informed by the characteristics of the area and its constituent parts and the key issues and challenges facing them' (para 4.2).
- 3.12 PPS12 encourages Council's Core Strategies to make clear choices about where developments should go in broad terms so that, inter alia, decisions on planning applications can be given a clear steer (para 4.5). It also requires that

the Core Strategy be supported by evidence of what physical, social and green infrastructure is needed, taking account of its type and distribution (para 4.8).

- 3.13 LB Croydon considers that from a strategic point of view, the future supply of land for burials and providing for the future burial needs of the local community are such matters which need to be addressed within the Core Strategy. Consequentially, the study has been carried out in accordance with PPS12 and LB Croydon requirements for the development of the Core Strategy evidence base.
- 3.14 PPS12 states that this evidence base should include:  
*“Participation: evidence of the views of the local community and others who have a stake in the future of the area. Research/fact finding: evidence that the choices made by the plan are backed up by the background facts.”* (para 4.37, PPS12)
- 3.15 In all instances, the level of evidence gathered should be proportionate to the job being undertaken by the plan. PPS12 goes on to state that the development plan should also seek out and evaluate all reasonable alternatives (para 4.38). These elements assist in ensuring that the final development plan is ‘sound’ through being justified, effective and consistent with national policy.

## London Planning Policy

### London Plan (consolidated with alteration since 2004)

- 3.16 The London Plan: Spatial Development Strategy for Greater London (Consolidated with Alterations since 2004) forms part of the statutory development plan for LB Croydon setting out the strategic planning policy framework for Greater London.
- 3.17 Policy 3D.19: Burial Space of the London Plan directs Local Authorities to consider the burial needs of its residents when formulating their LDFs. Specifically, the Policy states:  
*“DPD Policies should ensure that provision is made for London’s burial needs, including the special needs of certain religious or cultural groups for whom burial is the only option. Provision should be based on the principle of proximity to local communities. The Mayor will promote the policies for sustainable cemeteries published by London Planning Advisory Committee (LPAC) in 1997.”*

### Consultation Draft Replacement London Plan (2009)

- 3.18 On 12 October 2009, the Mayor published his Consultation Draft Replacement Plan, ‘The London Plan: Spatial Development Strategy for Greater London’. Draft Policy 7.23: Burial Spaces, continues to provide the mandate for Local Planning Authorities to address their burial space needs through their LDFs.
- 3.19 In addition, the overall strategy for burial spaces contained in Draft Policy 7.23 specifically refers to protecting existing burial space and states:

*“The Mayor will work with Boroughs, cemetery providers and other key stakeholders to protect existing burial spaces and to promote new provision.”*

- 3.20 Supporting text to the draft policy notes the potential that woodland burial sites have in providing additional links to London’s green infrastructure (para 7.56). The draft plan also recognises that there is a lack of up to date burial supply data for London and states that the Major, along with the MoJ, cemetery providers and key stakeholders, will work to establish the current situation and barriers to supply (para 7.57).
- 3.21 Consideration will also be given to any necessary changes to planning policy and the provision of supplementary guidance (para 7.57).

### **Planning for Burial Space in London (1997)**

- 3.22 The LPAC policies referred to in Policy 3D.19 of the London Plan are set out in a report entitled “Planning for Burial Space in London” (LPAC, 1997) where the extent of London’s burial land supply was first assessed. Whilst the report strongly advocated a legislative change to allow the re-use of existing graves to provide additional, and ongoing capacity for burials, it also established the following seven strategic principles for burial provision generally:
- 1 Choice – people should have the choice of burial or cremation.
  - 2 Cost – the bereaved should not be penalised by abnormally high charges for burial.
  - 3 Proximity – burial provision should be local to the population needing it.
  - 4 Open Space – cemetery provision should respect the valuable roles of open space.
  - 5 Historical Features – cemetery management should maintain and improve historic features, taking account of the whole setting in which tangible historic remains survive.
  - 6 Archaeology – cemetery provision and reuse should safeguard and follow the investigation of archaeological remains.
  - 7 Biodiversity – cemetery management should maintain and improve natural assets.

## **Local Planning Policy**

### **Croydon Unitary Development Plan (as saved 2009)**

- 3.23 Forming part of Croydon’s statutory development plan, the Croydon Unitary Development Plan (CUDP, 2009) sets out the local planning policy framework in which land use planning and decisions are made. On 10 July 2009 the Government Office of London issued the Direction of the Secretary of State setting out which CUDP policies are saved from 13 July 2009 (“saved policies”) until superseded by subsequent Development Plan Document policies prepared

under the LDF. Any policies referred to in this report are “saved” by virtue of the 10 July 2009 Direction.

3.24 The CUDP contains no burial provision policy, although Policy CS7 provides for the LB Croydon’s surplus land to be released for suitable alternative uses, having regard to location, sustainability objectives and other priorities and strategies.

3.25 Policy R01 is concerned with maintaining the open character of the designated Metropolitan Green Belt and Metropolitan Open Land. It permits essential facilities for cemeteries within the Green Belt and Metropolitan Open Land so long as they:

- Preserve the openness of the Green Belt;
- Are essential, genuinely required facilities; and
- Do not seriously conflict with the purposes of including land in the Green Belt.

### **Emerging Croydon Local Development Framework**

3.26 Between 8 February 2010 and 21 March 2010 LB Croydon placed on consultation the Core Strategy Preferred Options (CSPO). The Core Strategy sets out how the Borough should develop in the period up to 2031. As set out in the CSPO the preferred growth strategy for the Borough is to direct growth to places with concentrations of existing infrastructure investment that either have capacity to grow or where further sustainable investment is possible over the plan period.

3.27 The CSPO (para 7.42) informed by the NLP Interim Burial Need Report:

- Identifies a shortage of burial space in LB Croydon;
- identifies a particular shortage of burial provision in the north of the Borough; and
- Recognises the growing pressures on existing burial provision and that it is imperative that a strategy is put in place to deal with future demand.

3.28 The final draft Core Strategy will be published in Autumn 2010, the public hearing is to be held in Summer 2011 and adoption is expected in 2012.

### **Croydon Sustainable Community Strategy (2008-2011)**

3.29 Whilst there are no specific objectives or actions in the Community Strategy planned to address future burial needs, key themes which will benefit directly or indirectly from a study of the Borough’s burial land need and provision include:

- Theme 1 – Safer, Stronger and More Sustainable Communities – assisting in promoting community cohesion, a sense of community and community engagement.

- Theme 6 – Delivering High Quality Public Services and Improving Value for Money – both central to the Council’s corporate ambitions for the Borough.

## Summary

- 3.30 There is currently no statutory duty upon Local Authorities to provide burial space for residents. The provision of burial facilities is therefore a matter of discretion for Local Authorities. There are, however, a number of Acts which provide Local Authorities with various legislative powers relating to burial land provision.
- 3.31 In relation to planning policy there is a clear recognition at a regional level and an emerging recognition at a local level to plan for future burial needs through the protection of existing facilities and the promotion of new facilities, where required.
- 3.32 When identifying burial need and planning for future provision it is clear at all policy levels that consultation should be carried out with relevant parties.

## 4.0 Burial Provision in Croydon

4.1 This chapter of the report outlines the existing provision of burial land within LB Croydon. Burial provision outside the administrative area of LB Croydon but used by LB Croydon Bereavement Services is also examined.

### LB Croydon Burial Sites

4.2 The existing cemeteries in LB Croydon or used by LB Croydon are identified in Table 2 below and accompanying plan: Croydon Cemeteries and Zones Map (**Appendix A**). Seven of these are associated with churches, three are owned and managed by LB Croydon and one is used by LB Croydon but operated by LB Sutton. The burial grounds in LB Croydon together cover nearly 40 ha or 0.4% of the total land area in LB Croydon.

Table 4.1 Existing Cemeteries in Croydon

Name	Location	Area (ha)	Maintenance	Map Ref
Mitcham Road Cemetery and Crematorium	West Thornton	20.60	LB Croydon	1
Queen's Road Cemetery	Selhurst	9.70	LB Croydon	2
All Saints Vicarage	Upper Norwood	0.64	LB Croydon	5
All Saints (Parish)	Sanderstead	1.73	Private	6
St. John (Parish)	Coulsdon	0.89	Private	7
St. John Memorial Garden	Shirley	1.46	Private	8
St. James Rest Garden	Purley	0.81	LB Croydon	9
St. Mary (Parish)	Addington Village	0.40	LB Croydon	10
St. Peter	South Croydon	0.67	LB Croydon	11
<b>Cemeteries Used by LB Croydon but Outside Administrative Boundary</b>				
Greenlawn Memorial Park	Warlingham	3.60	LB Croydon	3
Bandon Hill Cemetery	Wallington	6.25	LB Sutton	4

4.3 The four municipal cemeteries operated or used by LB Croydon are examined in more detail below.

### LB Croydon Municipal Burial Sites

4.4 LB Croydon Bereavement Services utilise four existing cemeteries, two of which are within their administrative boundary. These four cemeteries are examined below following discussions with LB Croydon Bereavement Services and site visits undertaken on 26 November 2009. A proforma of each site including plans and further details has also been completed (**Appendix B**).

## **Mitcham Road Cemetery and Crematorium**

- 4.5 Opened in 1897, Mitcham Road Cemetery and Crematorium is the largest cemetery used by LB Croydon both in terms of services and land take. The site measures 20.3ha with approximately 17.4ha laid out for burials. The site is located within West Thornton in the north west of the Borough close to the administrative boundary with LB Merton to the west. The site is also referred to as Croydon Cemetery and Crematorium.
- 4.6 Mitcham Road acts as the 'on-site' administrative centre for LB Bereavement Services housing an office and burial records. The site office is located on the north part of the site alongside other more 'modern' facilities including the crematorium, car park (80 spaces) and public facilities. The site also includes a mortuary and burial chapel. The Cemetery Operatives (gravediggers) have a mess room, toilets and storage area close to the Mitcham Road entrance.
- 4.7 The appearance of the graveyard is typical of many Victorian graveyards with a range of ages and types of headstones laid out from the access roads and paths. Trees are informally dispersed through the site with some areas of grass and shrub left to grow more naturally to form informal 'conservation areas'.
- 4.8 Vehicular access to the site is taken from Mitcham Road (A326) to the south and Thornton Road (A23) to the east. Facilities and burial plots are accessed from the internal roads leading from these entrances that meet close to the main hub of facilities on the northwest part of the site. Additional pedestrian access to the site is taken from the public footpath that runs east-west through the site linking Aurelia Gardens and Mitcham Common. This footpath is bisected by the internal cemetery access road linking Mitcham Road to the public facilities. In terms of public transport, the cemetery is accessible by bus from Mitcham Road and Thornton Road (routes 64, 109, 198, 250 or 289) and tram (500m from Therapia Lane stop to the south).
- 4.9 The size of the site means that it has a number of adjoining land uses including; residential, office, employment, education (and associated playing fields), allotments, recreation, common land and a football ground.
- 4.10 In terms of planning designations, the site is identified as Metropolitan Open Land and a Site of Nature Conservation Importance in the adopted UDP. The site is also partly within an Archaeological Priority Zone.
- 4.11 The cemetery has around 43,992 full body and cremated remains graves. New burial plots for both full body and cremated remains were exhausted in 2005, with only family and reclaimed graves presently available.

## **Queens Road Cemetery**

- 4.12 Queens Road Cemetery opened in 1861 and is the oldest public burial site in LB Croydon. The 9.7 site is located in the north of the Borough within a built up residential area of Selhurst. The cemetery has limited facilities, with no dedicated car park, toilet facilities or chapels. The existing chapel and toilets

on site are in a state of disrepair and not in use at present. There are no operational buildings on site at present.

- 4.13 The site is maintained by two retained ground staff who also provide the 'public face' of the cemetery. Administrative services are carried out at Mitcham Road Cemetery.
- 4.14 The Victorian cemetery has an open appearance with some trees and hedges throughout the site. This open appearance is partly due to the age of the graves contained within the graveyard which have been overgrown and grassed over in time. This gives the appearance that the graveyard is not full when in fact there are a numbers of 'layers' of graves throughout most of the site.
- 4.15 Large parts of site are overlooked by the residential properties on all four sites. The site is landlocked by Queens Road, Princess Road, Pawsons Road and Mayo Road and the residential properties beyond. Vehicular access is taken from Queens Road to the south with parking taking place on the internal access road. Additional pedestrian access is taken from Princess Road and Pawsons Road. The nearest railway station is Thornton Heath approximately 650m to the north. Bus route 450 runs along Queens Road and stops at the cemetery and provides links to central Croydon and Thornton Heath.
- 4.16 The site is designated as Local Open Land in the CUDP. Pawsons Road is a defined Local Distributor Road.
- 4.17 The cemetery has around 38,149 full body and cremated remains graves. Like Mitcham Road, new burial plots for both full body and cremated remains have been exhausted. At Queens Road Cemetery this occurred during the 1960's. Only family and reclaimed graves are presently available at the cemetery.

### **Greenlawn Memorial Park**

- 4.18 The Greenlawn Memorial Park is located outside of the LB Croydon within Tandridge District to the south east. Greenlawn opened in 1937 as a privately owned cemetery with LB Croydon taking ownership ten years later. The Memorial Park is located on the eastern edge of Wallingham to the east of Chesham Road.
- 4.19 Greenlawns is an American style lawn cemetery where traditional memorials are replaced by inscribed bronze plaques placed at ground level. This gives the 3.6ha site a more ordered appearance. The site has a much more intensive maintenance programme than the Victorian cemeteries to retain the 'kept' appearance.
- 4.20 The only access to the site is from Chesham Road, this leads to an internal access road looping round the site allowing convenient access to all graves. The generous width of these roads allows parking to occur without blocking other vehicles. The site includes an entrance gatehouse which comprises of a site office, public waiting area and public toilets. There is a flat on the upper floor which is used by the site superintendant. There are two permanent staff

that manage and maintain Greenlawn. The only other building on site is a maintenance and storage shed close to the gatehouse.

- 4.21 The site is not overlooked with surrounding land uses comprising some residential properties, grazing land and a wooded area to the north. A bridleway runs adjacent to the eastern boundary of the site.
- 4.22 In terms of public transport, the nearest railway stations are Upper Warlingham and Whytelleafe approximately 2.7km to the west. The number 403 bus links Warlingham with central Croydon.
- 4.23 The site is within the designated Green Belt and an Area of Great Landscape Value in the Tandridge Local Plan 2001. In terms of planning history, LB Croydon has previously submitted planning applications to Tandridge Council to change the use of an area of 4.4ha to the north east of Greenlawn from grazing to burial land in 1995, 2001 and 2003. These applications were all withdrawn before determination, following indications from Tandridge Council that they were not intending to support the proposals.
- 4.24 The original cemetery reached its burial capacity in 1998 however the removal of a restrictive covenant allowed further burials to be located around the grounds' perimeter. The extended cemetery has around 9,548 full body and cremated remains graves with a dedicated Muslim burial area which has around 388 graves.
- 4.25 LB Croydon currently estimates that there is capacity for an additional 180 full body burial (FBB) graves and 100 new Muslim graves along with 160 cremated remains plots.

### **Bandon Hill Cemetery**

- 4.26 The 6.25ha Bandon Hill Cemetery was opened in 1900 by the Croydon Rural District Council. Due to boundary changes, it later became a joint burial authority for the Corporation of Beddington and Wallington and the Coulsdon and Purley Urban District Council. The site now lies with the administrative area of LB Sutton created in 1965 and is jointly used by the London Boroughs of Croydon and Sutton.
- 4.27 Day to day administration and central support services are provided by LB Sutton. However, the management of the cemetery is overseen by a Joint Committee comprising elected members from both Councils who meet biannually. LB Croydon Bereavement Services do not therefore have direct involvement in the operation of Bandon Hill.
- 4.28 The Victorian cemetery includes a chapel at the centre of the site and a single storey maintenance building to the west. There is a lodge adjacent to Plough Road used by the site superintendant. There is no dedicated parking, instead informal parking occurs on the internal access roads. Vehicular access is provided from Plough Lane to the east with an additional pedestrian access to the west from Rockwood Avenue. The site slopes from the north and west down towards Plough Lane and the railway line to the south. Consequently, the

cemetery is overlooked from the rear of the properties on Queenswood Avenue and Rockwood Avenue to the north.

- 4.29 Surrounding land uses comprise residential properties to the north and east, a railway line to the south and allotments to the west. The nearest railway stations are approximately 850m away, with Waddon to the east and Wallington to the west. Bus route 455 stops at the Cemetery on Plough Lane and provides a link to the rail network and Croydon Tramlink.
- 4.30 The sites has number of designations in the adopted Sutton UDP 2003 (SUDP) including; Metropolitan Open Land, Metropolitan Green Chain, Site of Importance for Nature Conservation and Archaeological Priority Area. Part of the Demesne Road Allotment site immediately west of the cemetery totalling 1.6ha is designated as Land Safeguarded for Cemetery Extension in the SUDP. Retention of this allocation is a Preferred Option in the emerging Site Development Policies 2009 forming part of the emerging Sutton LDF.
- 4.31 The cemetery contains around 15,270 full body and cremated remains graves. In line with Mitcham Road and Queens Road we understand that Bandon Hill has no new full body or cremated remains burial plots available.

## **Provision Summary**

- 4.32 Mitcham Road is the principal cemetery in LB Croydon in terms of size, facilities and administrative functions.
- 4.33 Within close geographic proximity is Queens Road Cemetery in the north of the Borough, a long standing burial site with no supporting facilities for LB Croydon or the public.
- 4.34 Outside of the administrative area to the south in Tandridge District is Greenlawn Memorial Park which is the newest of the cemeteries and provides 'American' style plaques resulting in a more formal and kept appearance. Greenlanwn provides a waiting room and toilets for public use.
- 4.35 Bandon Hill, unlike the other cemeteries, is not run by LB Croydon. The site is within LB Sutton and used jointly by the two authorities. Bandon Hill is the only cemetery with safeguarded land for potential future expansion.



## 5.0 **Stakeholder Consultation**

### **Introduction**

5.1 Key stakeholder consultation has been undertaken at an early stage of the study with a focus on funeral service providers, religious groups and adjoining local authorities.

5.2 The latter is focused on discovering the level, cost and type of LB Croydon usage of burial facilities in adjoining Boroughs and the potential for joint working and future capacity levels. Consultation with funeral service providers and religious groups consists of gathering information to inform the identification of issues and potential options.

5.3 The consultation has been undertaken in accordance with current best practice contained in national planning policy and LB Croydon procedures.

### **Scope of Consultation**

5.4 PPS12 requires that the level and scope of consultation for evidence base documents be proportionate to the 'job been undertaken' (para 4.37). For the purposes of this study, it was not considered necessary or appropriate to consult beyond that set out in the targeted consultation process below.

5.5 A process of targeted consultation with key stakeholders forms a key part of this study. The targeted consultation process is proportionate to the scope of the study (PPS12, para 4.37) and has been agreed with LB Croydon. The purpose of the consultation process is to:

- Inform the options assessments;
- Identify the extent of, and opportunities for, joining working with adjoining Local Authorities; and
- Assist with criteria formulation for assessing the potential of sites for new facilities.

5.6 In addition to the consultation undertaken for this study, LB Croydon intend to seek the views of the general public as part of the Council's statutory consultation on its LDF.

## **Consultation, Methodology and Process**

### **Methodology**

5.7 The consultation has been formulated to identify the most relevant individuals and organisations to the objectives of the study (see Chapter 1), including LB Croydon based faith groups/organisations and funeral directors across the Borough and adjoining Local Authorities.

- 5.8 Consultation with faith groups/organisations and funeral directors comprises evidence gathering to assist the identification of issues and potential options in Chapters 7-11 of the study.
- 5.9 The consultation with adjoining Local Authorities is focused on ascertaining the level of LB Croydon usage of existing burial facilities in adjoining Boroughs, the type and quality of facilities, their capacity to accommodate future demand, the cost of burial for LB Croydon residents and importantly, to identify any potential opportunities for joint working.
- 5.10 Three proformas targeted to the three different consultees/types were drawn up (**Appendix C**).

## Process

- 5.11 The consultation proformas were sent to the three key stakeholder groups between 19-21 October 2009. A covering letter briefly explained the purpose of the study and consultation process is also included.
- 5.12 The targeted consultation included:
- 1 21 Croydon based faith groups and associated organisations
  - 2 7 neighbouring Local Authorities that share an administrative border with LB Croydon (including the Superintendent of Bandon Hill Cemetery);
  - 3 22 Croydon based funeral directors and associated services
  - 4 5 other organisations which were thought to have a particular interest or involvement in Croydon burial facilities were also contacted.
- 5.13 The faith groups and religious organisation consultees were identified through consultation with the Bereavement Services and Planning Policy Departments of LB Croydon. Contacts were also identified through the 'Faiths Together in Croydon' Report produced by Croydon Voluntary Action and Croydon Council in March 2008. Funeral directors in Croydon were identified through the online funeral directors database at [www.uk-funerals.co.uk](http://www.uk-funerals.co.uk) and general online business directories including [www.thompsonlocal.com](http://www.thompsonlocal.com) and [www.yell.com](http://www.yell.com). Adjoining Local Authorities were identified through administrative mapping and contact names for the relevant department obtained.
- 5.14 A Stakeholder Consultation List and Responses (**Appendix D**) identifies all of the targeted consultees.
- 5.15 Consultation letters and proformas were posted to all of the consultees identified. Where email addresses could be obtained, the letter and proforma was also sent electronically, this amounted to 40 emails. All letters and emails were sent between 19-21 October 2009 requesting any responses by 3 November 2009. It is important to note that consultation responses received after 3 November have not been discounted from the study.

## Consultation Results

- 5.16 Fifteen consultation responses were received from the 55 consultees representing a total response rate of 27%. Two additional responses were received from faith groups as a result of consultees passing on the proforma to relevant contacts. A total of seventeen consultation responses have therefore been received and are summarised below.

### Faith Groups

- 5.17 Of the nine faith groups who responded, four stated that current burial facilities in LB Croydon met their needs, whilst only one stated that the current provision was not adequate. One respondent noted that “Our needs are met except Bandon Hill is filling up”. Five respondents noted their percentage of public/private burial space used, the respective figures for public facilities are 100%, 100%, 99%, 70% and 10% suggesting the majority use public facilities.
- 5.18 For the future provision of burial space, a number of respondents supported all of the potential options (i.e. better use of existing facilities, extension and new facilities). One respondent stated that extended or new facilities “would certainly be preferable” and another that “adjoining virgin land” should be used and that new burial space should “integrate into parkland”. One respondent also noted that the provision of a new cemetery “would in the long term be the best solution for the future”.
- 5.19 Two respondents noted that the provision of new burial space should be located within the LB Croydon. Only one respondent suggested a location for new burial space stating that: “land might be available in the Purley Way/Beddington Area”.
- 5.20 The factors that were considered to be important in determining locations for new burial space were; cost and convenience, accessibility by public transport, located away from residential homes and “a degree of future proofing in terms of space available” according to the responses on this issue.
- 5.21 The majority of faith groups consulted did not object to grave re-claim or re-use, although only one respondent actively supported both. One respondent stated that reclaimed graves were “offensive”.

### Neighbouring Local Authorities

- 5.22 Two of the neighbouring Local Authorities completed and returned a proforma. Additionally, the Superintendent of Bandon Hill Cemetery completed a proforma.
- 5.23 LB Sutton has completed a proforma for Sutton Cemetery which confirms that it provides for new burials and cremated remains. The site covers 8.64ha and includes an administrative office and chapel. Non Sutton residents pay approximately double for graves and burials, although no Croydon residents currently use Sutton Cemetery. Annual burial rates are approximately 100 new

burials, 10 reclaimed/re-used graves and 40 cremated remains burials. On this basis, 40 years capacity is identified.

- 5.24 LB Sutton identified a previous proposal for a potential new crematorium and woodland burial site at Oaks Park with LB Croydon as a joint working initiative. However, LB Sutton have stated that this is no longer feasible as the majority of the land has been sold.
- 5.25 LB Sutton also completed a Burial Land Response Sheet in March 2009 in response to a request from LB Croydon. This response did not form part of the targeted consultation process of this study, however it does provide relevant background information. It confirms that LB Sutton are responsible for two cemeteries (Sutton Cemetery and Cuddington Cemetery). LB Sutton also work in partnership with LB Croydon at Bandon Hill Cemetery (see Chapter 4) and LB Merton on the Merton and Sutton Joint Cemetery Board.
- 5.26 LB Sutton has safeguarded allotment land adjacent to Bandon Hill Cemetery for a future expansion of the cemetery. The Superintendent of Bandon Hill Cemetery completed a proforma which identified approximately 130 reclaimed/re-used and 60 cremated remains burials per annum. Of these, approximately 40% are for Croydon residents who pay approximately 25% more than Sutton residents. Current capacity is estimated at 30 years.
- 5.27 LB Merton identified four cemeteries under their control; Merton and Sutton Joint Cemetery, London Road Cemetery, Gap Road Cemetery and Church Road Cemetery. LB Merton have not completed a proforma for each, but note that the authority provides new burial and cremated remains plots and specific facilities for Muslim and Jewish needs. Approximately 220 new and 20 cremated remains burials are undertaken per annum. Approximately 13% of burials are for LB Croydon residents, who pay three times as much as LB Merton residents. A supply of approximately 6-8 years was identified at London Road and Gap Road Cemeteries and between 1-10 years at Merton and Sutton Joint Cemetery (depending on burial type).
- 5.28 LB Merton has not identified opportunities for joint working with LB Croydon.

## **Funeral Directors**

- 5.29 Two of the three funeral directors who returned the proforma stated that existing burial facilities in LB Croydon did not meet the needs of clients. One noted that clients were using Streatham Cemetery. Two noted that needs should be met through extended or new sites and stated “the current cemeteries are overcrowded as it is”. Two specifically noted a need for a woodland burial site.
- 5.30 Cane Hill in Coulsdon was the only site identified for a potential new cemetery. Respondents suggested a number of factors that should be taken into account when determining potential new burial space location: accessibility by public transport, flooding, land quality, plot sizes, plot types, supporting facilities, grave prices and resident views.

## Other Groups

- 5.31 Responses were received from the Mayday Hospital Maternity Unit and Sands Still Born & Neonatal Death Charity. With regards to the factors that are important in determining locations for new burial space, it was noted that burial provision must take into account Croydon's diverse multicultural society and segregation of burials for religious beliefs are both important.
- 5.32 Parents usually chose burials over cremation for infant deaths and that reduced sized children's plots were acceptable to parents. In some instances parents have travelled outside of their administrative area to use specific children's cemeteries such as at Redstone in Redhill.

## Summary

- 5.33 The targeted consultation exercise has identified a number of key factors to inform the options assessments and the criteria for assessing potential new or extended sites. A summary of key findings is set out below:
- 5.34 Options Assessment
- 1 Majority of respondents used public burial facilities
  - 2 No strong preference between intensification, extension or new burial sites
  - 3 There is varying burial capacity in neighbouring authorities, but this is generally higher in LB Sutton than LB Merton
  - 4 Approximately two thirds of funeral directors identified that existing public facilities in LB Croydon did not meet the need
- 5.35 Opportunities for Joint Working
- 1 None identified
- 5.36 Extension and New Sites
- 1 Key factors to consider are public transport accessibility, cost, land quality and facilities
  - 2 No specific new burial sites identified
- 5.37 The results of the consultation have been integrated into the relevant chapters of the study.



## 6.0 The Need for Future Burial Land Provision

6.1 This chapter establishes the need for additional burial land within LB Croydon. In doing so we examine:

- The projected burial demand, including the effect of pandemics and increased Muslim burials;
- The nature and extent to which the existing public facilities within LB Croydon, or those operated by LB Croydon, can meet this demand; and
- The baseline, alternative and maximum (pandemic) burial needs for LB Croydon.

### Burial Demand

#### Methodology

6.2 The purpose of the quantitative demand assessment is to determine the future demand for public burial provision over the lifetime of the LDF (to 2031). The method for estimating burial demand comprises the following stages (stages A-F):

- a Obtain the projected population rates for LB Croydon over the period 2009-31.
- b Obtain the projected death rates for LB Croydon over the period 2009-31.
- c Estimate the number of deaths of LB Croydon residents which will be handled by LB Croydon over the period.
- d Calculate current Full Body Burial (FBB) levels and cremation levels (including buried cremated remains) using actual data (2002-08).
- e Estimate the future need for FBB by applying the average percentage of FBB to predicted deaths within LB Croydon.
- f Estimate the future demand for the burial of cremated remains by applying the average percentage of buried cremated remains to predicted deaths within LB Croydon.

6.3 In assessing Croydon's burial land needs, the Borough has been broken down into four zones: North, Central, East and South. This largely reflects the Spatial Management Areas adopted by LB Croydon within its LDF. The breakdown is set out below and is shown in **Appendix A**:

Table 6.1 Croydon Zones

Area	Wards
North	Ashburton, Bensham Manor, Norbury, South Norwood, Thornton Heath, Upper Norwood, West Thornton and Woodside.
Central	Addiscombe, Broad Green, Croham, Fairfield, Selhurst and Waddon.
East	Fieldway, Heathfield, Kenley, New Addington, Sanderstead, Selsdon and Shirley.
South	Coulsdon East, Coulsdon West and Purley.

## Data Assumptions and Analysis

- 6.4 Burial demand has been assessed over the period 2009-31 with a breakdown of the projected demand provided for each year individually and split into five year periods from 2011 onwards, in line with the Croydon LDF.
- 6.5 The main data sources used to assess demand is as follows:
- GLA 2008 Round Ward Level Demographic Projections (2009-02, March 2009) produced by the Data Management Analysis Group (DMAG) for population projections and predicted number of deaths.
  - LB Croydon Bereavement Services for total deaths handled by LB Croydon over the period, 2002-08 including the number of burials (2002-08), cremations (2002-08) and burials of cremated remains (2004-08).
- 6.6 Other data sources used are referenced individually within the report. It is important to note that the GLA data and the LB Croydon data are recorded over a slightly different period (GLA Mid year – Mid year and LB Croydon April – March); the data is therefore not entirely compatible. We have nonetheless used these data sets, due to the lack of any more appropriate data sources, and the fact that it is not possible to accurately rebase them.
- 6.7 All results of the baseline analysis are shown in Tables i - x in **Appendix E**.

## Findings

### Stage A – Population

- 6.8 The population estimates for LB Croydon have been obtained from the GLA 2008 Round Ward Level Demographic Projections (2009-02, March 2009) produced by the DMAG.
- 6.9 The low mid-year population projection has been adopted as DMAG considers that this data is the most robust projection for detailed analysis (DMAG 2009-02, page 2). An extract from Table i at Appendix E showing the population within LB Croydon for 2001, 2009, 2011, 2016, 2021, 2026 and 2031 is set out below:

Table 6.2 Population Estimates

<b>Population</b>							
	<b>2001</b>	<b>2009</b>	<b>2011</b>	<b>2016</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>
Croydon North	120,987	121,030	121,417	124,156	124,174	124,875	127,416
Croydon Central	88,410	92,509	95,498	117,699	129,816	122,871	114,807
Croydon East	87,178	85,003	84,891	85,960	85,682	90,799	100,022
Croydon South	38,904	39,385	39,795	43,015	44,113	45,477	46,786
<b>LB Croydon</b>	<b>335,479</b>	<b>337,927</b>	<b>341,601</b>	<b>370,830</b>	<b>383,785</b>	<b>384,022</b>	<b>389,032</b>

6.10 The GLA data shows that the overall population within LB Croydon is predicted to rise by 16% from 335,479 in 2001 to 389,032 in 2031. In relation to the individual zones within the Borough, Croydon Central is anticipated to see the most significant population rise of approximately 30%. This is in line with the significant levels of housing growth planned within this area.

6.11 In terms of population structure, the percentage difference between the actual population structure in 2001 and that predicted for 2031 is set out in the table below.

Table 6.3 Percentage Difference Between Actual Population Structure 2001 and Predicted Population Structure in 2031

	<b>Working Age (16-59 years Female and 16-65 years Male)</b>	<b>Retired (60+ years Female and 65+ years Male)</b>
Croydon North	0%	52%
Croydon Central	28%	32%
Croydon East	13%	38%
Croydon South	11%	59%
LB Croydon	12%	44%

Source: DMAG, 2008 Round Ward Level Demographic Projections (March 2009)

6.12 The most significant change in the population structure at Borough level occurs in relation to those over retirement age (60 years Female/ 65 years Male) with an increase of 21,861 (44%). This is mirrored at a zone level where all zones will see a significant percentage increase in people of retirement age. We anticipate that this increase can in part be attributed to medical advances, improvements in lifestyles and new technologies.

6.13 When compared to the other zones, Croydon Central will see the greatest increase in people of working age and those under the age of 15 years. This is compared to Croydon North which will see a decrease in children under the age of 15 and no change in people of working age. We consider that this difference can partially be attributed to the planned housing growth within Croydon Central and the associated in migration.

## Stage B – Number of Deaths of LB Croydon Residents

- 6.14 The predicted number of deaths is also taken from GLA 2008 Round Demographic Projections, low mid-year population projections (2009-02, March 2009).
- 6.15 The GLA projections are based on actual mid-year deaths up to 2007 and then predicted forward using DMAG's own model which is informed by Office for National Statistics (ONS) data. It is important to note that these predictions do not take into account the potential effect of a pandemic.
- 6.16 The data obtained from the GLA is not broken down to ward level, therefore it has been necessary to apportion the number of deaths for each zone based on the predicted population levels.
- 6.17 For the Borough as a whole the GLA predicts that the number of annual deaths will decrease from 2,755 in 2002 to 2,229 in 2031. This will represent an average annual decrease of -0.73%. This is mirrored at zone level where the number of deaths is also predicted to fall. This downward trend is likely to reverse at some point given the ageing population, but based on the GLA predictions it does not occur during the study period.
- 6.18 The death levels from 2021 do however start to increase potentially taking into account ONS<sup>4</sup> data which predicted that on average LB Croydon residents who reach the age of 65 post 2000 will live for a further 17.6 years.
- 6.19 An extract from Table ii at Appendix E showing the estimated number of deaths for 2009, 2011, 2016, 2021, 2026 and 2031 is set out below:

Table 6.4 Deaths of LB Croydon Residents

	<b>2009</b>	<b>2011</b>	<b>2016</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>
Croydon North	909	896	764	698	717	730
Croydon Central	694	705	724	730	705	658
Croydon East	638	627	529	482	521	573
Croydon South	296	294	265	248	261	268
<b>LB Croydon</b>	<b>2,537</b>	<b>2,521</b>	<b>2,280</b>	<b>2,157</b>	<b>2,204</b>	<b>2,229</b>

## Stage C – Estimated number of deaths of Croydon residents handled by LB Croydon

- 6.20 The next stage is to calculate the proportion of the LB Croydon predicted deaths which would be handled at LB Croydon burial facilities.
- 6.21 In order to calculate this, data has been obtained from LB Croydon for the actual number of deaths handled at public facilities between 2002 and 2008.

<sup>4</sup> ONS Statistics - [http://www.statistics.gov.uk/downloads/theme\\_population/LE\\_EW\\_2009.xls](http://www.statistics.gov.uk/downloads/theme_population/LE_EW_2009.xls)

To allow comparison with the number of deaths predicted by the GLA, inflow has been subtracted (i.e. non-Croydon residents buried or cremated at LB Croydon operated facilities).

- 6.22 Due to the limited data available, it is difficult to accurately estimate the level of inflow. However, using LB Croydon internal historical data and Officer judgements, we have estimated a conservative inflow figure of 10%. Based on our current understanding of the demand and nature of burial facilities within the surrounding Boroughs there is potential for this level of inflow to increase if LB Croydon broadened its range of burial services on offer (e.g. natural burials) or if supply issues were to arise within the other Boroughs.
- 6.23 The effect of increasing the inflow by 25% to 12.5% is therefore considered below (para 6.38).
- 6.24 Once inflow has been subtracted from the total actual deaths the new total is then divided by the total number of LB Croydon resident deaths as predicted by the GLA and then averaged over the 7 year period (2002-08) (See Table 7 below).
- 6.25 Based on this data, captured at Table iii at **Appendix E** on average LB Croydon disposes of 77% of the Borough's deceased in its own municipal facilities, with 23% being handled at public facilities outside the Borough or private facilities.

Table 6.5 Average Percentage of Deaths Handled by LB Croydon

Year	2001	2002	2003	2004	2005	2006	2007	2008
Total deaths within Croydon (GLA figures)	-	2,755	2,745	2,718	2,597	2,590	2,427	2,350
Total deaths handled by Croydon Council (At LBC operated facilities)	2,311	2,330	2,466	2,263	2,168	2,037	2,045	2,165
Total deaths handled by Croydon Council minus 10% inflow i.e. non-Croydon residents	2,080	2,097	2,219	2,037	1,951	1,833	1,841	1,949
Percentage of Total Deaths of Croydon residents in LBC facilities	N/A	76%	81%	75%	75%	71%	76%	83%
<b>Average</b>								<b>77%</b>

- 6.26 We are not aware of any particular reason why the death rate of LB Croydon residents handled at LB Croydon facilities might deviate significantly from the average (77%), although we recognise that should LB Croydon broaden its range of burial services, the attraction of LB Croydon may increase for local residents thereby stemming outflow to non-Croydon facilities.
- 6.27 The effect of increased retention to 85% (10% increase) is therefore considered below (para 6.38).
- 6.28 The annual average number of deaths handled by LB Croydon during 2002-2008, has been applied to the predicted number of deaths of LB Croydon residents in order to estimate the future number of deaths handled at LB Croydon facilities.

- 6.29 An extract from Table iv at **Appendix E** showing the estimated number of deaths of Croydon residents handled by LB Croydon for 2001, 2009, 2011, 2016, 2023 and 2031 is set out below:

Table 6.6 Estimate Number of Deaths of LB Croydon Residents Handled at LB Croydon Facilities

	<b>2009</b>	<b>2011</b>	<b>2016</b>	<b>2021</b>	<b>2026</b>	<b>2031</b>
Croydon North	700	690	588	537	552	562
Croydon Central	535	543	557	562	543	506
Croydon East	491	482	407	371	401	441
Croydon South	228	226	204	191	201	206
<b>LB Croydon</b>	<b>1,953</b>	<b>1,941</b>	<b>1,756</b>	<b>1,661</b>	<b>1,697</b>	<b>1,716</b>

### Stage D – Burial and Cremation Level

- 6.30 LB Croydon currently offer two options in dealing with the deceased either burial (various types available) or cremation. Based on the data supplied by LB Croydon for the last seven years (2002-08), an average of 87% of bodies handled at LB Croydon facilities are cremated and 13% are buried, as shown in Table v at **Appendix E** and below:

Table 6.7 Burial and Cremation Levels

<b>Year</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
Cremations (Croydon Residents) (minus 10% inflow)	1,827	1,948	1,767	1,688	1,590	1,615	1,667
Full Body Burials (FBB) (Croydon Residents) (minus 10% inflow)	270	272	270	263	243	226	282
Average Number of Cremations	1,729						
Average Number of FBB	261						
Average Percentage Cremations	87%						
<b>Average Percentage FBB</b>	<b>13%</b>						

- 6.31 The level of cremations within the Borough is 87% which is high compared to the national average (75%<sup>5</sup>) and the London average (71%<sup>6</sup>). At this stage we have not identified any clear reasons for this, but consider that it is likely to be as a result of a number of factors including limited new grave space within the Borough, changing social attitudes to cremations, relaxation of some religious requirements, and potentially as a result of the increased cost associated with a full body burial when compared to cremation.

<sup>5</sup> Cremation Society of Great Britain, England and Wales 2008 data

<sup>6</sup> Planning for Burial Space in London, London Planning Advisory Committee, 1997, Page 6

- 6.32 For the purpose of this baseline assessment we have not altered the burial and cremation levels over the study period. However, we consider that given the environmental issues associated with cremations this level may reduce over time (see Chapter 2.0), and therefore we have undertaken a sensitivity analysis to understand the effect a reduction would have. As the burial and cremation ratio has remained relatively static over the last seven years, we do not expect a significant change to occur to the extent that the levels become more akin to the national level.
- 6.33 As a result we have tested a limited change from 87:13 to 83:17, which represents a 5% increase in FBBs (see para. 6.38 below).

### **Stage E – Projected Demand for Public Full Body Burial space within LB Croydon**

- 6.34 In order to calculate demand for public FBB space within LB Croydon, the historic average percentage of burials (13%) has been applied to the estimated number of deaths of Croydon residents handled by LB Croydon post 2008 (see Tables iv and v at **Appendix E**). Inflow at the current level (10%) is then added to ensure that sufficient provision is made for people outside the Borough who wish to be buried in LB Croydon facilities. For each of the zones the demand for public FBB is calculated on a pro rata basis linked to death rates. A summary of the baseline burial demand for the Borough as a whole is set out below with the full year by year breakdown set out in Table vi, **Appendix E**.
- 6.35 As shown in the Table vii at **Appendix E** and below, the level of FBB are expected to fall over the period which is in line with the falling death rates.

### **Stage F – Projected Demand for Public Burial of Cremated Remains within LB Croydon**

- 6.36 In order to assess the demand for public burial of cremated remains within LB Croydon the historic average of buried cremated remains is first calculated using actual data supplied by LB Croydon<sup>7</sup> (see Table viii, **Appendix E**). This level (9%) is then applied to the estimated number of cremations of LB Croydon residents handled by LB Croydon post 2008 (see Table ix and x at Appendix E). Inflow at the current level (10%) is then added to ensure that sufficient provision is made for people outside the Borough who wish for their remains to be buried within a LB Croydon facility. For each of the zones the demand for public burial of cremated remains is calculated on a pro rata basis linked to death rates. A summary of the baseline cremated remains burial demand for the Borough as a whole is set out below with the full year by year breakdown set out in Table ix, **Appendix E**.
- 6.37 As with FBBs the predicted number of buried cremated remains is also predicted to fall due to the falling death rates.

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<sup>7</sup> Figures provided by LB Croydon includes cremated remains buried in full graves

## Burial Demand Scenario Testing

6.38 We have undertaken sensitivity tests to assess the extent to which changes to some of our assumptions would affect the overall burial demand. The changes to the assumptions and reasons for the changes were explained previously and are summarised in the three scenarios below:

- Scenario 1 - Increased use of LB Croydon facilities by LB Croydon residents (77% to 85% - 10% increase) to reflect an increase in demand if new burial options are provided.
- Scenario 2 – Reduction in the level of cremations (increase in FBB burials) from 87% to 83% (5% decrease) due to growing awareness of environmental issues associated with cremations.
- Scenario 3 – Increase in inflow from 10% to 12.5 % (2.5% increase) due to potential increased in attraction of LB Croydon facilities and possible supply problems in the other surrounding Boroughs.

6.39 We have not tested an increase in buried cremated remains (currently estimated at 9%) because, given the current high levels of cremations over the past four years and the relatively low number of remains which are buried, we see no reason for this to increase especially in light of a potential increasing FBB demand.

6.40 In testing each of the above scenarios, only the named variable (e.g. inflow) has been changed for comparison purposes. For each of the scenarios the demand at Borough level for FBBs and cremated remains burial is set out below, with the detailed zone breakdown set out in **Appendix F**.

Table 6.8 LB Croydon Scenario Testing

		Base line	Scenario 1		Scenario 2		Scenario 3	
			No.	% diff	No.	% diff	No.	% diff
FBB LB Croydon Residents	<b>09-31</b>	5,242	5,786	10%	6,855	31%	5,242	0%
FBB LB Croydon Residents including inflow	<b>09-31</b>	5,824	6,369	9%	7,437	28%	5,991	3%
Burial of Cremated Remains LB Croydon Residents	<b>09-31</b>	3,213	3,547	10%	3,066	-5%	3,213	0%
Burial of Cremated Remains LB Croydon Residents including inflow	<b>09-31</b>	3,571	3,904	9%	3,423	-4%	3,673	3%

6.41 All of the above scenarios for FBB have been assessed on the basis that the FBB demand will not fall below baseline level.

6.42 Increasing the retention level (Scenario 1) and inflow (Scenario 3) will result in a limited increase in demand for FBBs over the period (545 and 167 respectively) and therefore are not considered to be sensitive assumptions.

- 6.43 However, our analysis demonstrates that by reducing the level of cremations handled by LB Croydon (Scenario 2) to 83%, and thereby increasing the number of FBBs handled by LB Croydon to 17% (from 13%), this will result in a significant increase in demand. Whilst not expected, the demand could increase further if the burial and cremation levels become more akin to the national level.
- 6.44 It is possible that we may see an increase in all three assumptions, but it is unlikely that the increases will all be in line with the scenario levels and therefore the demand is not expected to exceed the scenario predictions.
- 6.45 Given this potential increase in demand, we consider it necessary to factor in an additional amount or 'cushion' to ensure that a sufficient demand is planned for. Whilst we cannot predict with any certainty what this additional demand may be, we consider that for FBBs a 'cushion' of 20% would be reasonable as this is an approximate mid-point between Scenarios 1 and 2.
- 6.46 As with FBBs, any increase in retention levels and inflow in relation to the burial of cremated remains will result in a limited increase in demand over the period (334 and 102 respectively). Scenario 2 will however result in a modest decrease given that any increase in FBB demand will as a consequence reduce demand for the burial of cremated remains. The predicted decrease will however not be significant.
- 6.47 Despite a potential future decrease in the burial of cremated remains under Scenario 2, we consider that a potential additional level of demand should still be planned for. This should not be to the same extent as FBBs. We assume a 'cushion' of 2.5% which is also an approximate mid-point between the Scenarios 1 and 2.
- 6.48 The below table sets out the baseline projected demand including inflow along with an alternative demand scenario which includes the suggested demand 'cushions'.

Table 6.9 Burial Demand 2009-2031

	Projected Demand		Alternative Demand Scenario	
	FBB	Buried Cremated Remains	FBB (20% Cushion)	Buried Cremated Remains (2.5% Cushion)
Croydon North	1,951	1,196	2,341	1,226
Croydon Central	1,812	1,111	2,174	1,139
Croydon East	1,385	849	1,662	870
Croydon South	680	417	816	427
<b>LB Croydon</b>	<b>5,824</b>	<b>3,571</b>	<b>6,989</b>	<b>3,660</b>

## Muslim Burial Demand

- 6.49 It is important to consider the potential future demand for Muslim burial in the Borough due to the specific Muslim burial requirements (see Table 1), and because Islam is the second largest religious group (5%) within the Borough after Christianity (65%)<sup>8</sup>.
- 6.50 Whilst, we recognise that Judaism has very specific burial requirements the Jewish population within LB Croydon is very low (0.3%). We also understand that the needs of the Jewish community are already being met at Jewish Burial Grounds. As a result this report does not specifically explore the specific burial needs of the LB Croydon Jewish community.
- 6.51 In order to calculate the potential demand the following methodology has been adopted:
- Stage 1 - Using 2001 Census Data and the GLA Round Ethnic Population Projection (low) figures to estimate changes in religious mix within the Borough over the period 2009-31.
  - Stage 2 - Apply the annual percentage increase in LB Croydon Muslim population levels to average LB Croydon Muslim Burials level to predict demand over the period 2009-31.
- 6.52 It is important to note that this methodology does not take into account the age structure of the Muslim population within LB Croydon.

### Stage 1 – Changes in religious mix within the Borough

- 6.53 Changes in religion are not predicted forward for LB Croydon by either the ONS or the GLA. However, it is possible based on the 2001 census data for LB Croydon, to estimate ethnicity by religion as shown in the Table i, **Appendix G**.
- 6.54 The ethnic breakdown for Muslims within the Borough can then be applied to the 2008 GLA low mid-year ethnic population projections (which breaks down the 2008 Low Mid-Year Round Ward Level population projections used above by ethnicity see para 6.8). Using this data, the population change (based on ethnicity) within the Borough can be predicted over the period. An extract from Table ii at **Appendix G** showing the Muslim population change within LB Croydon for 2001, 2009, 2011, 2016, 2021, 2026 and 2031, is set out below:

Table 6.10 LB Croydon Muslim Population

Population							
	2001	2009	2011	2016	2021	2026	2031
<b>Muslims</b>	17,945	23,609	26,005	29,218	32,177	33,923	35,632
<b>Total Population LB Croydon</b>	335,479	337,927	341,601	370,830	383,785	384,022	389,032

<sup>8</sup> Census data 2001 and GLA Round Ethnic Population Projection 2008

## Stage 2 – Muslim Burial Demand

- 6.55 In order to calculate the potential increase in Muslim burial demand, data has been obtained from LB Croydon Bereavement Services on the actual number of Muslim deaths handled at Greenlawns, the only Muslim burial facility within the Borough.
- 6.56 Based on this data, LB Croydon carries out an average of 32 Muslim burials each year.
- 6.57 Using this average as an approximate base figure at 2008 we have then applied the annual increase in the Muslim population within LB Croydon, in order to estimate the level of demand for Muslim burials during the study period. The projected Muslim burial demand for each year is set out in Table iv at **Appendix G** and summarised below. The annual LB Croydon Muslim burial levels increases from 32 in 2008 to 50 in 2031.

Table 6.11 Projected Demand for Muslim Burials within LB Croydon

<b>Period</b>	<b>LB Croydon</b>
2009-11	102
2012-16	193
2017-21	217
2022-26	232
2027-31	244
<b>Total</b>	<b>988</b>
<b>20% Cushion</b>	<b>1186</b>

6.58 As with FBBs, we consider that if enhanced Muslim burial facilities were to be provided within the Borough there is a potential for the demand for Muslim burials to increase. Therefore, inline with FBBs, a 20% cushion is applied to ensure that there is sufficient supply. It is important to note that when planning for this requirement the needs of the different Islamic denominations will need to be taken into account.

## Pandemic

6.59 Influenza pandemics, which include Swine flu (H1N1) and Bird flu (H5N1) are a natural phenomena, and tend to occur two or three times each century. Pandemics arise when a new influenza virus emerges and spreads rapidly across the world, with widespread epidemics in different countries. The severity of a pandemic varies, but in the last century there were three pandemics: the 'Spanish Flu' of 1918/19, in which 20 to 40 million people worldwide died (with peak mortality rates in people aged 20-45); the 'Asian flu' of 1957/58 and the 'Hong Kong flu' of 1968/69. While the pandemics in 1957/58 and 1968/69 were much less severe, they still caused significant illness levels (mainly in the young and the old) and an estimated 1 to 4 million deaths between them.

6.60 Based on Department of Health (DoH) guidance<sup>9</sup> another pandemic is highly likely to occur, but there is uncertainty about the timing. Therefore in testing the proposed effect of a pandemic within Croydon we have arbitrarily chosen two test dates 2016 and 2026. A pandemic could occur at anytime over the period, or not at all.

6.61 In previous pandemics, the overall clinical attack rate was between 25% and 35% of the population. This is compared to seasonal influenza which normally

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<sup>9</sup> Department of Health, Pandemic Influenza Guidance for Commissioners and Providers of Social Care, January 2009

attacks between 5% and 15% of the population. However, based on Department of Health advice a total infection attack rate of up to 50% is possible. We therefore consider, for the purposes of this study, it is appropriate to test a 50% attack rate scenario.

- 6.62 From those infected, the Department of Health estimates that between 0.37% and 2.5% of those will die over a typical 15 week pandemic period.
- 6.63 Based on an LB Croydon population of 370,830 in 2016, this could mean an additional 386 to 4,635 deaths over a typical 15 week pandemic period, with an estimated 20% of those deaths occurring in a one week period alone. Should the pandemic occur in 2026, given the population increase (13,192) the potential death rate could increase to between 710 and 4,800. Whilst both estimates would include a number people contained in the normal death figures a high proportion of these deaths would be in addition to the normal death levels.
- 6.64 Taking current burial demand level and assuming all deaths are dealt with by LB Croydon, up to 13% (93 to 624) bodies would require burial during the pandemic period. We have been advised by LB Croydon Bereavement Services that in this situation it would be necessary to bring in emergency measures.

## Burial Supply

- 6.65 Having calculated the demand, we now turn to assessing the current supply of public burial space within the facilities owned and managed by LB Croydon.
- 6.66 When calculating the current burial supply at this stage, we have only considered existing **new burial space**.
- 6.67 As set out in Chapter 4 there are currently 11 cemeteries located with LB Croydon or solely operated by LB Croydon Council. Eight of these are associated with churches and three (Mitcham Road, Queen's Road and Greenlawn) are owned and managed by LB Croydon Council. In addition, LB Croydon jointly run Bandon Hill cemetery which is located within LB Sutton.
- 6.68 These cemeteries are identified on the Croydon Cemeteries and Zone Map (**Appendix A and B**).
- 6.69 The available supply of the three public cemeteries and Bandon Hill is set out below:

Table 6.12 Estimated Public Burial Supply

<b>Cemetery</b>	<b>Location</b>	<b>Size (Ha)</b>	<b>New FBB Supply</b>	<b>FBB Graves No. of bodies</b>	<b>New Cremated Remains Plots</b>
Queens Road	Queen's Road, Croydon	9.7	0	0	0
Mitcham Road (Croydon)	Mitcham Road, Croydon	20.6	0	0	0
Greenlawn Memorial Park	Chelsham Road, Warlingham, Tandridge	3.6	280 (100 Muslim Graves)	460	160
Bandon Hill	Plough Lane Wallington	6.25	0	0	0
<b>Total</b>	-	-	<b>280</b>	<b>460</b>	<b>160</b>

6.70 There is currently a limited supply of new graves (460) and new cremated remains plots (160). The only new graves and cremated remains plots are at Greenlawn which is located outside LB Croydon. There are currently no new public burial plots within the Borough.

## Estimated Need

### Baseline Need

6.71 The total the baseline need over the plan period is estimated by taking the demand away from the supply. In calculating need it is assumed that the supply will be used at the earliest possible opportunity. For each zone it is also assumed that the available supply is distributed evenly between the zones as all LB Croydon residents have the same opportunities to use these facilities. A detailed breakdown of the need is set out in Table i, **Appendix H**, a summary of which is set out below:

Table 6.13 Estimated Baseline Burial Need 2009-2031

		<b>Demand</b>	<b>Supply</b>	<b>Need</b>
<b>FBB LB Croydon Residents</b>	North	1,756	115	1,641
	Central	1,631	115	1,516
	East	1,247	115	1,132
	South	612	115	497
	<b>LB Croydon</b>	<b>5,242</b>	<b>460</b>	<b>4,782</b>
<b>FBB LB Croydon Residents including inflow</b>	North	1,951	115	1,836
	Central	1,812	115	1,697
	East	1,385	115	1,270
	South	680	115	565
	<b>LB Croydon</b>	<b>5,824</b>	<b>460</b>	<b>5,364</b>
<b>Burial of Cremated Remains LB Croydon Residents</b>	North	1,076	40	1,036
	Central	1,000	40	960
	East	764	40	724
	South	375	40	335
	<b>LB Croydon</b>	<b>3,213</b>	<b>160</b>	<b>3,053</b>
<b>Burial of Cremated Remains LB Croydon Residents including inflow</b>	North	1,196	40	1,156
	Central	1,111	40	1,071
	East	849	40	809
	South	417	40	377
	<b>LB Croydon</b>	<b>3,571</b>	<b>160</b>	<b>3,411</b>

6.72 Our analysis shows that baseline demand (760 FBB and 466 cremated remains 2009-11) will outstrip supply (460 FBB and 160 cremated remains plots) within two years resulting in a very significant residual need over the LDF period. This residual need (5,364 FBB and 3,411 cremated remains) represents the minimum level which should be planned for over the period.

### Additional Needs

6.73 There are a number of issues to be considered when predicting future changes to the baseline position and, whilst informed scenario testing has been carried out, it is not possible to predict with any certainty the future changes in burial demand.

- 6.74 Nevertheless, given the potential for burial demand to increase it is necessary to plan for a higher level to ensure that a sufficient supply is provided and so that there are no shortage issues.
- 6.75 Therefore, we recommend that that options to meet the projected demand should be identified along with options to meet the potential additional demand (see table 18 below), even though this additional demand may this may not come about. Within this new provision suitable provision should be made for the predicted Muslim burial requirements.

Table 6.14 Alternative Demand Scenario 2009-2031 (Excluding Pandemics)

	Alternative Demand Scenario	
	FBB (20% Cushion)	Buried Cremated Remains (2.5% Cushion)
Croydon North	2,203	1,185
Croydon Central	2,036	1,098
Croydon East	1,524	829
Croydon South	678	386
<b>LB Croydon</b>	<b>6,437</b>	<b>3,496</b>

- 6.76 Whilst, pandemics cannot be factored into typical demand calculation the potential impact of a pandemic on death levels should be planned for by the Council.

## Summary

- 6.77 The assessment finds that the 'baseline demand' for both 'full body burials' (FBB) and the 'burial of cremated remains' (BCR) is predicted to decrease over the period, due to falling death rates. Nevertheless, our analysis finds that there will still be significant demand for both burial types: namely, 5,824 FBB and 3,571 BCR during the 2009-31 period.
- 6.78 Our scenario testing has demonstrated a hypothetical potential for the level of FBBs to increase by 20% with the potential for a more limited 2.5% increase in BCRs. We have also found that, within this provision, up to 1,186 burial plots over the period 2009-2031 need to be provided for the growing Muslim population in LB Croydon.
- 6.79 Baseline demand will outstrip supply (see Table 6.13) within two years, resulting in a very significant residual need over the period 2011-2031. Based on our scenario testing, this demand could increase further making it necessary to plan for a higher level to ensure that a sufficient supply is provided to meet demand. This results in an alternative need of 8,775 FBBs and BCRs, increasing to 9,933 with an assumed 20% 'cushion'.

Table 6.15 Baseline and Alternative Need Scenario

	Baseline Need		Alternative Need Scenario	
	FBB	Buried Cremated Remains	FBB (20% Cushion)	Buried Cremated Remains (2.5% Cushion)
North	1,836	1,156	2,203	1,185
Central	1,697	1,071	2,036	1,098
East	1,270	809	1,524	829
South	565	377	678	386
<b>LB Croydon</b>	<b>5,364</b>	<b>3,411</b>	<b>6,437</b>	<b>3,496</b>

- 6.80 Annually, this represents a potential baseline burial requirement over the period of 244 for FBBs and 155 for BCRs. This increases to 292 for FBBs and 159 BCRs when an appropriate cushion is factored in.
- 6.81 In addition, LB Croydon Council is obliged to plan for the possibility of pandemics, whenever one might occur and whatever the impact a pandemic may be. To reflect such uncertainty we have not directly included this data within our burial demand calculations. However, based on our analysis, we predict that LB Croydon may have to ensure that emergency measures are in place for the burial or cremation of up to 4,800 deaths over a 15 week period based on Home Office guidance.
- 6.82 In conclusion, there is a need (excluding pandemics) for LB Croydon to identify land for around 10,000 burials (6,500 FBB / 3,500 BCR) or 500 per year over the next 20 years .



## 7.0 **Options Identification and Potential**

7.1 We have identified a need for additional burial provision within LB Croydon. By not addressing this situation, burial demand will outstrip supply within two years.

7.2 The purpose of this chapter is therefore to identify options to meet this need and establish which options should be taken forward for further consideration.

### **Option Identification**

7.3 To identify options to meet the identified need we have explored with LB Croydon Bereavement Services the current and past burial methods to meet the need, and future trends.

7.4 From this research we have identified four potential options which could theoretically meet the need:

- 1 Intensification - grave re-claiming and re-use, or other methods of increasing density
- 2 Joint working with adjoining Local Authorities
- 3 Extension of existing facilities; and
- 4 Development of new sites

### **Option Potential**

7.5 Prior to considering these options in detail it is first necessary to assess the potential of these options in practice to meet the need. Only options which are considered to have practical potential in reality to meet the need have been taken forward to the more detailed analysis stage.

Table 7.1 Potential Options to Meet the Need

Option	Potential to meet the need	Next Stage
Intensification	<p>Re-claiming graves and infilling is currently used at Mitcham Road and Queens Road Cemetery. We therefore consider that there is potential for this option to meet some or all of the need.</p> <p>Re-use is not currently used within LB Croydon but, similar to re-claim, has potential to meet an element of the need.</p> <p>Other methods intensification measures need to be explored as this may have potential to meet some or all of the need</p>	<ul style="list-style-type: none"> <li>• Identify all potential intensification options</li> <li>• Assess potential capacity of reclaim or re-use to meet the need</li> </ul>
Joint working with adjoining local authorities	<p>This option has the potential to meet some or all of the need. However, as set in Chapter 5.0, only one joint working initiative was identified by LB Sutton. However, we understand that this was previously considered by LB Croydon and discounted.</p>	<ul style="list-style-type: none"> <li>• Option not taken forward for further detailed analysis as potential in practice is limited.</li> </ul>
Extension of Existing facilities	<p>In theory, we consider that this option has potential to meet some or all of the identified need, but the extent to which an extension to an existing facility can meet the need is unknown and is to be explored further.</p>	<ul style="list-style-type: none"> <li>• Identify sites through on-site and desk-based research</li> <li>• Sieve sites through set criteria</li> <li>• Analyse filtered sites in detail</li> </ul>
New sites	<p>This option has potential to meet some or all of the identified need, but in the extent to which new sites can meet the need is unknown and is to be explored further.</p>	<ul style="list-style-type: none"> <li>• Identify sites through interrogation of LB Croydon's existing resources. This comprises Property Assets and Borough and London wide policy and strategy database along with our consultation responses.</li> <li>• Sieve sites through set criteria</li> <li>• Analyse filtered sites in detail.</li> </ul>

## Summary

7.6

Our option analysis has identified four options that might contribute to meeting the need. However, following a further analysis of their potential, we consider that only intensification, extension of existing facilities and new sites have any practical potential. These options have therefore been taken forward for further analysis.

## 8.0 **Intensification**

8.1 This chapter of the report considers the potential for the existing burial facilities operated by LB Croydon to be intensified to meet the identified burial need. In doing so this Chapter:

- 1 Identifies potential intensification options
- 2 Undertakes a detailed assessment of the potential options
- 3 Compares the assessment of the detailed options
- 4 Provides recommendations

### **Intensification Options**

8.2 Based on independent research and analysis of the three LB Croydon active burial sites and Bandon Hill we have identified the following potential intensification options:

- 1 Landraising - clearing existing memorials from sections of the cemetery and raising the land by spreading top-soil to a sufficient depth.
- 2 Intermediate burials - creation of new graves in between existing graves or through relocation of existing footpaths or re-use of unused portions of land e.g. flower beds.
- 3 Reclaim unused space in private graves - use of existing graves where remains are not disturbed i.e. where a grave was dug for four internments but only two bodies have been buried.
- 4 Reuse of graves - use of existing graves where remains are disturbed i.e. 'lift and deepen' to provide for additional and potentially ongoing burials in the same plot.

8.3 Prior to undertaking a detailed assessment of these options we discussed the options with LB Croydon Bereavement Services. As a result of this detailed discussion it was decided not to take the following options forward to the detailed assessment stage because:

- Landraising – not considered possible at the LB Croydon operated cemeteries due to layout constraints and the need to obtain consent to remove a large number of memorials at one time. It is also considered that landraising will detrimentally affect the character and appearance of the cemetery.
- Intermediate burials – LB Croydon do not consider it practical to remove pathways within existing cemeteries to maximise burial space as this would result in health and safety issues and potential disabled access issues. LB Croydon have already explored other intermediate burial option and consider that they have used all significant areas of unused spaces where this would not harm the character of the existing cemetery.

## Detailed Intensification Options Assessment

- 8.4 For the two options taken forward to the detailed stage, reclaiming of graves and reuse of graves, we have assessed them against the following factors:
- Practicality – whether this method of intensification can be implemented.
  - Public Acceptance – whether there would be any public resistance to this method.
  - Potential – the extent to which this option can meet the identified need.
- 8.5 Our assessment of the two intensification options against the above criteria is set out below.

### Reclaim Private Graves with Unused Space

#### Practicality

- 8.6 The process of reclaiming a grave is broadly as follows:
- 8.7 Identify a grave where the last interment was at least 75 years ago.
- 1 Check whether the grave is 'full'. For example if originally dug for four interments has four burials taken place.
  - 2 If there is space within the grave and the last interment was over 75 years ago try to notify the holder of the exclusive right of burial. This notification process follows a prescribed legal procedure.
  - 3 If an objection is received the burial authority may not extinguish an interment rights unless consent is given by the Secretary of State.
  - 4 If no objections received the grave can be brought back into Council ownership and resold for another interment.
- 8.8 Following discussion with LB Croydon Bereavement Services we understand that whilst the above process of reclaiming graves should be relatively straight forward it is difficult to reclaim graves in practice.
- 8.9 The first issue for LB Croydon arises in relation to identifying the plots where the last interment was over 75 years ago. Due to the age of the data the records are only in paper form and therefore need to be manually sorted. Once filtered the records then need to be examined further to establish whether the grave is 'full' or whether there is space for further interments.
- 8.10 Due to the obvious sensitivities surrounding the reclaiming of graves, the process of contacting the last known owner of the exclusive right of burial and advertising in the local press has to be undertaken with great care and takes a considerable amount of time to complete.
- 8.11 In total LB Croydon Bereavement Services estimate that the reclaiming of a grave takes around 12 months.

- 8.12 Once the desk based process is complete difficulties can still arise when adding another interment. For example a grave may be recorded as a four interment plot but only dug for three interments and as a result it could be full.
- 8.13 LB Croydon Bereavement Services estimates that a physical constraint, such as the original grave not being dug to the correct depth, occurs in around 10-15% graves they try to reclaim, although this does vary from plot to plot.

### Public Acceptance

- 8.14 At both Mitcham Road Cemetery and Crematorium, Queens Road Cemetery and Bandon Hill Cemetery the practice of reclaiming graves has been carried out since around 2004. The reclaiming of graves can not yet occur at Greenlawns as there are no interments over 75 years old. As shown in the table below the public acceptance of this method of burial appears to have improved given the year on year increase in the number of people getting buried within reclaimed graves<sup>10</sup>.
- 8.15 It is important to note that based on the data available we cannot establish whether this increase has been influenced by the fact that there are no other burial options available within these cemeteries.

Table 8.1 Number of Burials with Reclaimed Graves

Cemetery/Year	2004/05	2005/06	2006/07	2007/08
Mitcham Road	14	67	84	90
Queens Road	8	3	12	13

### Potential

- 8.16 Given the constraints identified above it is difficult to estimate the number of graves which could be reclaimed. However, based on historic data set out in Table 8.1 above and following discussions with LB Croydon Bereavement Services we broadly estimate that around 80 graves per year could be reclaimed at Mitcham Road and around 10 per year at Queens Road due to specific site constraints. Based on this we consider that over the period 2009 to 2031 a total of 1,980 graves could be reclaimed in total.
- 8.17 We do not have any data in relation to Bandon Hill, but based on the size of the cemetery in comparison to Mitcham Road and Queens Road we estimate that around 1,000 graves could be reclaimed.
- 8.18 It is important to note that, whilst this method of reclaiming graves will create significant capacity, it can never entirely meet LB Croydon's burial needs due religious requirements and peoples desire to be buried in a new grave.

<sup>10</sup> We have not been able to obtain the reclaimed grave data for Bandon Hill

## Reuse of Graves

### Practicality

- 8.19 The process of reusing a grave is broadly similar to that of reclaiming a grave apart from the fact that there is no requirement to identify graves where space remains. In addition an exhumation licence is required as the remains of the interments will be disturbed so that the grave can be deepened to create additional capacity.
- 8.20 Similar issues arise regarding the practicality of this method, including the identification of the plots and physical constraints associated with the deepening of graves.
- 8.21 At present LB Croydon have not reused any graves and cannot undertake grave reuse until LB Croydon Cabinet approval has been obtained. In addition, LB Croydon is waiting for advice from the MoJ on working practices and procedures.

### Public Acceptance

- 8.22 Unlike the reclaiming of graves the practice of reusing graves is not common and is only permitted by London Authorities as a result of a Private Members Bill. Outside London the reuse of graves is not permitted.
- 8.23 In June 2009 the MoJ indicated that due to the sensitivities surrounding the reuse of graves they have decided not to take this matter forward so as to allow the re-use of graves nationwide.
- 8.24 Within London, we are only aware of one Local Authority, the City of London where the practice of grave reused has occurred.
- 8.25 In terms of the general public acceptance of grave reuse, a paper was published by Davies and Shaw entitled 'Reusing Old Graves'<sup>11</sup>. This paper explored the public response to the idea of reusing old graves.
- 8.26 As part of the research interviews took place in four Local Authority areas with a total of 1,603 people. The interviewees were asked what would be a respectable time lapse before an old grave might be used for new burials by a different family. The question was open and gave the opportunity for respondents to specify a number of years, to comment that reuse should not take place at all, or to say that they were unsure.
- 8.27 The key findings from the survey was as follows:
- 1 55% of respondent specified a number of years before reuse could take place, and thereby indicated some support for the idea of reuse.

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<sup>11</sup> Davies, D. and Shaw, A. (1995) Reusing Old Graves: A Report on Popular British Attitudes, Crayford: Shaw and Sons

- 2 30% of respondents gave no numbers of years and said that graves should never be reused.
- 3 15% were undecided about reuse. However, analysis of the questions which asked more specifically about acceptability of remains being buried in a casket in a deeper grave indicated that a proportion of the 'undecided' group did in fact favour reuse increasing the percentage of interviewees supporting reuse to 62%.
- 4 Support for reuse was generally higher in London with around two thirds of respondents in favour.
- 5 The more professional the occupation of the respondents the greater the support for reuse.
- 6 For those respondents favouring reuse, a high proportion (92%) specified that reuse would be acceptable after a time lapse of up to 100 years.

8.28 Based on the survey there appears to a level of public support for reuse, in particular within London and from those interviewees from a higher social classification. However, the Davies and Shaw study does not provide conclusive evidence as to acceptability of this method of intensification and given the widely acknowledged sensitivities surrounding this issue, it would need to be further explored.

### **Potential**

8.29 Unlike reclaiming graves, the reuse of graves have not been carried out in LB Croydon, it is therefore difficult without interrogating the LB Croydon burial records to estimate the potential of this method. However, this method could in theory produce a significantly greater numbers of grave spaces as the supply of graves is not constrained by whether the grave is full.

8.30 As with the reclaiming of graves, it is important to note that this method can never entirely meet LB Croydon's burial needs due religious requirements and peoples desire to be buried in a new grave.

### **Comparison between Grave Reclaim and Reuse**

8.31 Based on the above it is clear that both methods of intensification have a number of practicality issues which makes the process of reclaiming or reusing graves difficult. However, based on our research there are no issues associated with either method which prevent there implementation.

8.32 In terms of the public acceptance of these methods, it is clear that the reclaiming of graves is broadly accepted by LB Croydon residents given the year on year increase of people being buried in reclaimed graves. In contrast the acceptance of grave reuse within LB Croydon is unknown and despite the research by Davies and Shaw indicating a potential public acceptance to grave reuse, LB Croydon will need to explore the acceptance of grave reuse in more detail.

8.33 With regards to the potential of both methods to meet the need it is difficult to estimate the number of graves spaces which could be created. However, it is clear that whilst the reclaiming of graves will create significant capacity, the reusing of graves has the potential to produce significantly greater numbers of grave spaces.

## Recommendations

8.34 Based on our assessment the reclaiming of graves can meet some of the identified Full Body Burial and Cremated Remains Burial needs. In theory the reuse of graves could also meet some of the identified needs but further research into the public's acceptance of this method is required along with advice from the Government.

8.35 We therefore recommend that LB Croydon:

- Continues the current practice of reclaiming graves;
- Undertakes further research into the number of graves that can be reclaimed in order to accurately predict future potential; and
- Explore the possibility of reusing graves with LB Croydon residents as this method of intensification has the potential to provide greater levels of capacity over the next 20 years.

8.36 However, it is important to note that neither of these methods could entirely meet the identified burial needs due to specific religious requirements and personal preferences and therefore other options need to be explored.

## 9.0 **Extension Sites Options Assessment**

9.1 This chapter of the report considers the potential for an extension to one or more of the four existing burial sites owned or operated by LB Croydon to meet the identified need. This is one of the options for the provision of new burial land identified in Chapter 7. This chapter is structured as follows:

- 1 Extension sites size;
- 2 Extension sites Identification;
- 3 Extension sites initial options assessment;
- 4 Extension sites detailed options assessment; and
- 5 Conclusions of extension sites assessment.

### **Site Size**

9.2 In identifying potential extension sites we have first considered the minimum site area required for an extension site in terms of viability and operational requirements.

9.3 LB Croydon Bereavement Services have advised that the minimum site area for an extension to an existing burial site would be approximately 2ha. This is the minimum site size that could feasibly support an extension to one of the existing burial sites. Any smaller extensions sites would provide only a 'piecemeal' extension site that would not be viable due to the ground preparation and infrastructure required. We have not included the provision of any additional facilities within the 2ha minimum extension area as it is assumed that existing facilities at the established cemeteries would be utilised.

### **Site Identification**

9.4 In identifying potential extension sites of 2ha or above we have used both desk based and on site observations. Aerial photographs and the CUDP Proposals map were used to identify potential open space or undeveloped land adjacent to the existing cemeteries. In addition, site visits were undertaken on 26 November 2009 to identify and consider the potential for extensions. LB Croydon Bereavement Services have also assisted in identifying and considering potential extension sites.

9.5 The potential extension sites are identified on the three extension sites plans (**Appendix I**) and Table 19 below. Potential extension sites with a site area of below 2ha have also been identified for completeness, however these sites are not considered as they will not meet the operational requirements of LB Croydon Bereavement Services (as identified in para. 9.2-9.3).

Table 9.1 Potential Extension Sites

Site	Size (ha)	Adjacent Existing Cemetery	Ref
Mayfield Road Playing Fields	4.30	Mitcham Road	ES1
Gonville Road Allotments	4.20	Mitcham Road	ES2
Land to the east of Greenlawn	4.40	Greenlawn Memorial Park	ES3
Land to the northeast of Greenlawn	4.70	Greenlawn Memorial Park	ES4
Demesne Road Allotments	3.98	Bandon Hill	ES5
Archbishop Lanfranc School	5.40	Mitcham Road	ES6
Croydon Athletic Football Club	1.37	Mitcham Road	ES7
Gonville Primary School	1.39	Mitcham Road	ES8
Land to the south of Greenlawn	0.97	Greenlawn Memorial Park	ES9
Land to the north of Greenlawn	1.55	Greenlawn Memorial Park	ES10

## Site Initial Options Assessment

- 9.6 The identified sites have been assessed against a number of ‘sieves’ to determine their initial suitability for burial land. The results of the initial options assessment set out in Table i: Extension Sites with Filters (**Appendix G**) and includes their reason for exclusion from the study where applicable. This sieving focuses on the feasibility (i.e. both operational and physical capacity) and deliverability (both availability and viability) requirements.
- 9.7 The sieves used are the same as those used to assess potential new burial sites (where possible) and include:
- Land in existing operational use and pipeline development;
  - Planning policy designations; and
  - Open space deficiency.
- 9.8 A full explanation of these sieves and justification for their use is set out in Chapter 10 of this study. It is recognised that two of the existing burial sites used by LB Croydon are located outside its administrative boundary (Bandon Hill within LB Sutton and Greenlawn Memorial Park within Tandridge District). A number of the potential sieving criteria such as CUDP specific policy requirements and designations will therefore not apply to extension sites to these cemeteries, but the relevant Sutton UDP and Tandridge Local Plan Policies will apply.
- 9.9 The remaining sites set out below have not been ‘filtered out’ and are taken forward to the detailed assessment stage. It is important to note that none of

the potential extension sites options identified and listed below are located within LB Croydon.

- 1 Land to the east of Greenlawn Memorial Park;
- 2 Land to the northeast of Greenlawn Memorial Park; and
- 3 Demesne Road Allotments.



## 10.0 **New Sites Options Assessment**

10.1 This chapter of the report considers the potential for new burial sites to be provided, within in the administrative boundary of LB Croydon to meet the identified burial need. This chapter is structured as follows:

- 1 New site size;
- 2 New Sites Identification;
- 3 New sites initial options assessment;
- 4 New sites detailed options assessment; and
- 5 Conclusions of new sites assessment.

### **Site Size**

10.2 In order to focus the search for sites it has been necessary to consider the minimum site area that would be required for a new burial site in LB Croydon and operated by the LB Croydon.

10.3 In considering a suitable site area we have liaised with LB Croydon Bereavement Services, undertaken site visits to existing municipal burial sites used by LB Croydon (as detailed in Chapter 4.0) and considered the existing size of burial sites across London.

10.4 LB Croydon Bereavement Services have advised that the minimum site area for a new burial site would be approximately 4ha. This is the minimum site size that could feasibly support a new burial site within LB Croydon. The smallest burial site currently used by LB Croydon is Greenlawns which has a site area of approximately 3.6ha, marginally under the 4ha requirement identified.

10.5 In additional to a minimum area of site required for burials, any new burial site will need to provide a minimum provision of public and maintenance facilities. In identifying a minimum site area we have therefore factored in provision of a public waiting area, toilets, office and maintenance hut/area. Internal access/servicing roads would also need to be accounted for. These facilities are considered the minimum provision of facilities that would be acceptable on a new burial site. This is based on discussions with LB Croydon Bereavement Services and our own site visits to existing LB Croydon cemeteries (see existing cemetery site proformas at **Appendix B**).

10.6 We have also investigated the average size of existing council owned cemeteries in all of the London Boroughs. The 1997 LPAC Report includes tables identifying the site areas for all existing council owned cemeteries in London (pg 21-53). The average site size across the capital is 8.85ha. For the nineteen 'outer London' Boroughs as defined in the London Plan (Consolidated with Alterations Since 2004) this figures falls to 6.27ha. These sizes are larger than the threshold identified in the above paragraphs thereby demonstrating

that area should not be reduced further based on the size of existing burial sites within London.

- 10.7 Based on the above evidence, a minimum site area of 4ha is considered appropriate for a new burial site. This takes account of operational requirements. LB Croydon Bereavement Services requirements and existing burial provision in the capital.

## Site Identification

- 10.8 This Chapter of the study considers the sources for identifying potential new burial sites within LB Croydon.
- 10.9 The potential burial sites options identified have been collated and identified in Tables i-v – Site Identification (**Appendix J**). A total of 126 sites of 4ha or over are identified.
- 10.10 To identify sites we have liaised with the Council’s Asset Management Property Section and Policy and Strategy Department to identify any Council landholdings (non-operational assets) or other known properties which may be suitable for more detailed consideration as new burial facilities.
- 10.11 We have drawn upon the Council’s existing resources (GLA SHLAA, Croydon SHLAA and employment land database) to identify potential public and private landholdings. We have also utilised the London Brownfield Sites Database.
- 10.12 This site identification using these sources is focused on vacant or derelict land and buildings (in any former use) and open land (e.g. agricultural, recreational, open space), as developed land in an existing use would not be viable for new burial space. We, in consultation with the Local Planning Authority, have also considered any planning applications submitted to LB Croydon (or neighbouring local authorities) for new cemeteries or extensions.
- 10.13 The consultation questionnaire (see Chapter 5) encouraged faith groups, funeral directors and neighbouring Local Authorities to identify potential land for burial space. This element of the consultation process effectively acted as a targeted “call for sites” exercise in the context of this chapter.
- 10.14 In compiling a comprehensive list of sites, we have sought to include as many sites as possible whilst remaining within the parameters of this study and the data available. The new ‘site search’ has utilised the most recent data sources at the time of research.

## Discounted Data Sources

- 10.15 Prior to analysing data sources for their potential suitability for burial land, the study considered a range of sources of information and site data in the context of their suitability for use in the study. A number of data sources were discounted as they were unsuitable for consideration. For completeness these ‘discounted data sources’ and their reason for exclusion are identified in Table 21 below:

Table 10.1 Discounted Data Sources

Data Source	Reason for Exclusion
National Land Use Database	Superseded by the London Brownfield Sites Database
London Development Database	LB Croydon have confirmed that there are no extant permission or current applications for burial facilities
Croydon UDP allocated sites	There are no current allocations for burial sites within the CUDP
Croydon Land Availability Assessment	No comprehensive data available and has been superseded by later research (such as the CSHLAA)
Draft Croydon Open Space Strategy (COSS)	The COSS covers the period 2005-2010 and provides a strategic assessment and overview of open space rather than a site by site breakdown. The COSS is more relevant as a tool for 'filtering' sites
Planning applications to LB Croydon	LB Croydon have confirmed that there are no extant permission or current applications for burial facilities

10.16 The data sources taken forward in this study for potential new sites are described in the following sections.

### London Brownfield Sites Database

10.17 The London Brownfield Sites Database (LBSD) is an online database produced by the London Development Agency (LDA) and Homes and Communities Agency (HCA). The LBSD builds upon the work of the National Land Use Database by collating information on brownfield sites from London Borough's Planning Authorities. The online database and associated information forms Stage 2 of the London Brownfield Sites Review and is:

*"...aimed at responding to underlying trends relating to Brownfield land through developing practical solutions for bringing sites to market more effectively."* (LDA and HCA, online 2009)

10.18 The LBSD identifies the following brownfield sites:

- 1 Previously developed land which is now vacant;
- 2 Vacant buildings;
- 3 Derelict land and buildings;
- 4 Land or buildings currently in use and allocated in the local plan and/or having planning permission; and
- 5 Land or buildings currently in use where it is know there is potential for redevelopment.

10.19 Stage 2 of the LBSD provides information for sites of 0.1ha or above across London on a Geographical Information System (GIS) dated October 2009.

### London's Housing Capacity

10.20 The Greater London Authority (GLA) is undertaking an ongoing London wide Housing Capacity and Strategic Housing Land Availability Project. The study collates information from each London Borough on identified sites with planning permission for housing and sites allocated for housing in Unitary Development Plans (UDP). The project also included a call for sites exercise. The latest 'call

for sites' and consultation exercise closed on 5 December 2008. The site data provided by LB Croydon to the GLA for this consultation is used in this study.

- 10.21 The datasets provided by LB Croydon to the GLA identifies small and large sites separately. For the purposes of this study, we have considered only 'large' sites. Small sites are those below 0.25ha and would not be suitable or viable for use as a cemetery on the basis of area alone. The 'large' Croydon sites of 4ha or over that were included in the latest review of the GLA Project have been included within this Study.

### **Croydon Strategic Housing Land Availability Assessment**

- 10.22 The Croydon Strategy Housing Land Availability Assessment (CSHLAA) seeks to identify potential housing sites in Croydon through a 'call for sites' process. Each LPA in England is required to carry out a SHLAA to inform their plan making and strategic housing land supply. Sites identified by landowners, developers and other interested stakeholders were put forward to LB Croydon for potential use as housing. This is the first stage of the process of identifying housing land to inform decision making.

- 10.23 The database dates from 2008 following a call for sites exercise that ended on 10 December 2007.

### **Croydon Employment Land Database**

- 10.24 LB Croydon maintains a database of employment sites within the Borough. The database includes all land with B Class uses as defined in the Uses Class Order (as amended) as well as some sui generis uses.

### **London Borough of Croydon Land Assets**

- 10.25 Whilst this Chapter of the study seeks to identify potential new burial space through various data relating to potential development sites, it is also recognised that existing land portfolios are key to identifying site options. The Asset Management Property Section at LB Croydon has significant land assets that have been included within the new sites assessment.

- 10.26 These existing land assets have been provided by LB Croydon. These landholdings principally consist of community and education uses as well as formal and informal open space. It is important to capture these sites at this stage of the study so that their suitability for use as burial land can be considered under the same site criteria as other datasets.

### **Sites Identified in the Targeted Consultation Process**

- 10.27 This study has involved key stakeholders in the determining need and provision of burial space. Part of consultation process described in Chapter 5 of this report asked respondents if they were aware of any sites that may be suitable for new burial land.

10.28 The overall response to the consultation process was limited with 15 of the 55 targeted returning the questionnaire (27%). Of these respondents, two identified potential sites for a new cemetery. These locations are identified below:

- Former Cane Hill Hospital, Coulsdon; and
- Land in the Purley Way/Beddington area.

10.29 Cane Hill has been identified through other sources and is included in the study. However, since this study focuses on new 'sites' it is difficult to assess general areas for development without site boundaries having been defined. Any potential sites in the Purley Way/Beddington are should therefore be captured through other data sources where applicable.

## Initial Options Assessment

10.30 This section of the study considers the potential of the sites identified in the initial options assessment. The potential new sites are 'filtered down' through two sieves.

10.31 The purpose of this stage of the study is to narrow down the full range of potential sites identified above through two assessment 'sieves' to identify the most suitable sites for the potential provision of new burial land for LB Croydon. The identified sites are assessed in Tables i-vii: Initial Options Assessment (**Appendix K**).

10.32 Sites that are not 'sieved out' in the Initial Options Assessment are the subject of more detailed analysis in the subsequent Detailed Options Assessment.

## First Sieve

10.33 The first sieving focuses on the feasibility (i.e. both operational and physical capacity) and deliverability (both availability and viability) requirements. This includes the availability of sites in terms of the existing number and nature of ownerships, and legal constraints, willingness to develop and timing of site availability. We have also considered whether potential landholdings which could be used for burial purposes are likely to be viable (NB: these have being discounted if unviable). The first sieves are identified below, explained further in the following paragraphs and applied in Tables i-vi (**Appendix K**):

- 1 Land in existing operational use and pipeline development;
- 2 Planning policy designations;
- 3 Open space deficiency; and
- 4 Protected open space and sports facilities.

10.34 Where possible the same filters have been applied to each data source. However, there are obvious differences between the sources of date, their presentation and information obtained. For example, sites identified through planning policy studies (such as SHLAA sites) have data relating to policy

definitions that LB Croydon land assets do not have. It has therefore been necessary to filter different data sets separately following the earlier identification of sites based on site size/operational requirements (site size is included in all sources of new sites). During this process, consistency in the treatment of data has been maximised where possible.

- 10.35 Sites that are identified in multiple datasets have been considered in one dataset to avoid double counting. In determining which datasets to remove duplicated sites from (and therefore which 'filters' to consider then against), we have selected the dataset that has the greatest number of similar sites. For example, open space is retained in the land assets table.

## **Land in Existing Operational Use and Pipeline Development**

### **Existing Operational Use**

- 10.36 A number of the identified sites are developed land in existing use that would not be viable for burial land. There are also likely to be constraints on land assembly, feasibility and availability. The study focuses on vacant or derelict land and we have therefore discounted any sites that are currently built out and operational. A number of identified new sites are in use for the following uses:

- 1 Offices – operational offices and associated infrastructure
- 2 Health – operational hospitals, surgeries and other medical buildings and associated land and infrastructure
- 3 Education – operational primary and secondary schools and colleges and associated playing fields, parking and infrastructure
- 4 Residential – existing private and social housing
- 5 Infrastructure – operational infrastructure including roads and depots
- 6 Retail – operational retail facilities and associated parking and infrastructure
- 7 Golf courses - operational golf courses on the basis that they are in active use with some built development on site

- 10.37 The above uses are not considered to be available for burial land. It is also unlikely they would be viable options for burial land.

### **Sites with Planning Permission**

- 10.38 Sites with outline or full planning permission have been discounted as they are not considered available for burial land. As with allocated sites, sites with planning permission are likely to be developed for their alternative permitted development or use.

## Planning Policy Designations

### Protected and Allocated Uses

- 10.39 Sites that have been protected for their current use or allocated for development in the London Plan or CUDP have been discounted from the study. There is a clear planning policy presumption in favour of development at these sites and they will therefore not be available or viable for burial land.

### Nature Designation

- 10.40 Planning (and other) policy seeks to maintain and protect land or buildings that are considered to be of natural or historic importance. This is set out in national policy contained within PPS9: Biodiversity and Geological Conservation (2005) and PPS5: Planning for the Historic Environment (2009) and is reflected in London and local policy contained with the London Plan and CUDP.

- 10.41 Specifically in relation to woodland, PPS9 states:

*“They [Local Planning Authorities] should not grant planning permission for any development that would result in the its loss of deterioration unless the need for, and benefits of, the development in that location would outweigh the loss of the woodland habitat.”* (para 10, PPS9)

- 10.42 Sites which are subject to the following designations have therefore being discounted:

- 1 Areas of Ancient Woodland as designated by Natural England;
- 2 Sites of Special Scientific Interest (SSSI) as designated by Natural England;
- 3 Sites of Nature Conservation Importance as designated by LB Croydon in the CUDP; and
- 4 Local Nature Reserve as designated by LB Croydon under the National Parks and Access to Countryside Act.

- 10.43 CUDP Policy NC1 provides a presumption against any development proposals that would harm nature conservation interests of these designated sites.

- 10.44 The nature conservation designations are identified in a number of the datasets used in the site identification stage. Sites that are solely subject to the above designations on part of the site have not been ‘sieved out’ where the remaining not designated part of the site is approximately 4ha or above in order to accord with the minimum site area threshold (see paras 10.2-10.8).

### Open Space Deficiency

- 10.45 PPG17: Planning for Open Space, Sport and Recreation (2002) requires all local authorities to assess the current provision of open space with their administrative areas against the level of access to open space (para 1-4). The aim of PPG17 in this regard is to assess the accessibility to open space at a

local level with a view to ensuring that sufficient levels are provided. PPG17 is clear that these assessments and open space ‘targets’ should be set a local level (para 6-9).

10.46 Policy 3D.8 of the Consolidated London Plan seeks to “*protect, promote and improve access to open space*”.

10.47 This policy and GLA guidance (paras 3.297-3.299) reflects PPG17 and requires London Borough’s to assess the provision of open space in terms of number of hectares per 1,000 population. Table 6 of the Draft Croydon Open Space Strategy identifies the provision of open space (hectares per 1,000) at ward level for Croydon (Scott Wilson 2004, pg. 20).

Table 10.2 Open Space Provision in Croydon by Ward

Ward	Open Space (ha) per 1000 Population	Ward	Open Space (ha) per 1000 Population
Addiscombe	0.00	Norbury	2.00
Ashburton	3.07	Purley	0.25
Bensham Manor	0.39	Sanderstead	9.78
Broad Green	0.76	Selhurst	0.57
Coulsdon East	21.91	Selsdon and Ballards	9.95
Coulsdon West	0.82	Shirley	2.18
Croham	2.92	South Norwood	1.95
Fairfield	3.80	Thornton Heath	1.02
Fieldway	2.25	Upper Norwood	1.38
Heathfield	13.70	Waddon	5.27
Kenley	9.93	West Thornton	0.08
New Addington	5.30	Woodside	3.87

Source: LB Croydon Draft Open Space Strategy (Scott Wilson 2004)

10.48 Policy R012 of the CUDP requires provision of 2.34ha of open space per 1,000 population in new development. We have used this adopted UDP standard for new development as a basis for discounting any ‘open space’ within those Wards that have been identified as having a deficiency of open space in local plan policy terms. These wards are highlighted in Table 22 above.

## Protected Recreation and Sports Facilities

10.49 The CUDP states that land in the Borough for sport and recreation uses is limited and difficult to reinstate if lost. CUDP Policy R015 therefore states that planning permission will be refused for development that results in the loss of outdoor sport, leisure and recreational facilities to other uses.

- 10.50 It is important to note that recreation facilities include allotments. Specifically in relation to allotments, the CUSP states:
- “Allotments are considered to be an important recreational and agricultural resource; they facilitate low cost, high quality, often organic sustainable food production, including specialist, culturally important crops of food not otherwise available; they can contribute to a healthier diet; they can engender strong social interactions, thus promoting social well-being; and they facilitate productive exercise.”* (LB Croydon 2006, para 6.52)
- 10.51 The latest Consultation Draft Replacement London Plan (Oct 2009) also makes reference to “Land for Food” in Policy 7.22.
- 10.52 The retention of existing sports and recreation land is therefore a key planning policy aim at national, regional and local level and sites falling within this category have been excluded from the detailed site assessments.
- 10.53 Recreation space has been identified through information on land use provided in the datasets.

### **Initial Findings**

- 10.54 Potential new sites identified through the ‘first sieve’ are shown in Table vi: Initial Options Assessment – Results of First Sieve (**Appendix K**). Applying the above filters to the 126 identified sites results in 95 sites being excluded. A total of 31 potential new sites have been identified for further consideration through a ‘second sieve’.

### **Second Sieve**

- 10.55 For the 126 sites originally identified it was not possible to apply all of the initial filter options as the original datasets did not include the same information (see para 10.34). However, following the identification of the 31 sites above, it has now been possible (given the reduced number of sites) to use desk based research to apply all of the above filters to these sites as well as considering deliverability constraints. The second sieves are identified below, explained further in the following paragraphs and applied in Table vii (**Appendix K**):
- 1 Nature designations; and
  - 2 Extension to first sieve on protected open space and sports facilities.
- 10.56 It is important to note that this stage of the site identification process has only been possible with a reduced number of sites to consider. In a number of cases, online mapping and the Croydon UDP have been used to identify the filters above (para 10.37-10.58) where the information was not provided in the original databases.
- 10.57 Site specific deliverability filters have also been applied at this stage due to the reduced number of sites.

## Extension of Initial Options Assessment Filters

- 10.58 Online aerial mapping, the Croydon UDP Proposals Map and consultation with LB Croydon Planning Policy has enabled the below initial options assessment filters to be applied to the 31 sites:
- Nature Designation (para 10.46) - the CUDP proposals map has also been used to identify sites designated as SSSI, Nature Conservation Importance and Local Nature Reserves;
  - Nature Designation (para 10.46) - areas of Ancient Woodland have been identified using the Ancient Woodland Inventory produced by Natural England and available digitally at [www.magic.gov.uk](http://www.magic.gov.uk); and
  - Protected Recreation and Sports Facilities (para 10.53) - online aerial mapping has also been used to identify active sports and recreation facilities.
- 10.59 Sites that are only part covered by the above designations/uses have not been 'sieved out' where the remaining part of the site is approximately 4ha or above.

### Deliverability Constraints

- 10.60 Deliverability comprises site availability and viability. This sieve has been undertaken with input from LB Croydon Asset Management Property Section to identify use restrictions, ownership and other covenants and online aerial mapping to identify physical deliverability constraints.
- 10.61 The availability of sites has been assessed by investigating the existing number and nature of ownerships, legal constraints, willingness to develop and timing of site availability.
- 10.62 Viability has been assessed by investigating if there is a reasonable prospect that the use of the site for burial purposes would not have a materially lower value than any realistic alternative use and/or any exceptional construction or operational cost.
- 10.63 Viability has also been considered having regard to existing on-site features that would add to the cost of using land for burials thereby making this use unviable. Heavily wooded or steeply slopping sights have been discounted on this basis. The environmental cost of tree removal is also considered a pertinent factor in site sieving. Larger sites that are part wooded or slopping have not been sieved out if the remaining area is approximately 4ha or above.

## Results of Initial Options Assessment

- 10.64 Applying the two 'sieves' to the identified sites results in the following potential new burial sites been identified and considered in the Detailed Options Assessment:
- 1 Cane Hill Hospital (parts)
  - 2 Land off Kent Gate Way (East) (part)

- 3 Land r/o Kingswood Way
- 4 Land at Fox Lane/Coulsdon Road (part)
- 5 Warlingham Court Farm (part)
- 6 Ashburton Park



## 11.0 Detailed Options Assessment

11.1 The previous chapters of this study have identified a number of potential extension sites (Chapter 9) and new sites (Chapter 10) for cemetery use. This section of the study provides a more detailed assessment of the identified options, and then compares the sites which are considered acceptable for cemetery use to establish the most appropriate development site(s).

11.2 The locations of these sites are identified on the site location plan (**Appendix L**). This also shows the locations of existing cemeteries used by LB Croydon.

### 11.3 Extension Sites

- 1 Land to the east of Greenlawn Memorial Park (NLP Ref: ES3)
- 2 Land to the north east of Greenlawn Memorial Park (NLP Ref: ES4)
- 3 Demesne Road Allotments (NLP Ref: ES5)

### 11.4 New Sites

- 1 Cane Hill Hospital (North and South) (NLP Refs: C2(a) and C2 (b))
- 2 Land rear of Kingswood Way (NLP Ref: C5)
- 3 Land at Fox Lane/Coulsdon Road (NLP Ref: E2)
- 4 Warlingham Court Farm (NLP Ref: E7)
- 5 Land off Kent Gate Way (NLP Ref: E18)
- 6 Ashburton Park (NLP Ref: E52)

## Methodology

11.5 Following the initial identification and sieving of options in the previous sections, a thorough assessment of the nine identified site options has been undertaken to establish their planning and development suitability and sustainability, and thus overall acceptability or otherwise.

11.6 The results of the Detailed Options Assessment for each site are contained within the site proformas (**Appendix M**). The proformas include a site plan, photographs and a table containing the following information:

- 1 Name and address, the extent of the site (measured in hectares using Promap), and its existing uses identified;
- 2 Planning context - designations and notations in the Croydon Unitary Development Plan (CUDP) and neighbouring authority development plans and extent to which cemetery use is policy compliant.
- 3 Vehicular access and traffic considerations;
- 4 Accessibility - proximity to those served and accessibility by public transport, walking and cycling;

- 5 Site conditions - groundwater, flood risk, drainage, contamination and nature conservation;
- 6 Site character - existing use, topography, landscape and townscape features, and historic environment (above and below ground);
- 7 Sustainability factors - land take, green/brownfield site, resilience to climate change, effect on travel patterns and CO2 emissions; and
- 8 Other planning factors - loss of existing land use, impact on residential amenity and compatibility with adjoining uses.

11.7 The above considerations have been informed through discussions with LB Croydon Bereavement Services who identified the following characteristics as important to burial land:

- 1 The site should be easily accessible, though preferably not on a busy main road. Public transport should be available as near as possible;
- 2 Low lying land or that adjacent to a river which is liable to become waterlogged or flooded will be expensive to drain;
- 3 Land with a high water table is likely to contravene the new legislation relating to the pollution of ground water with complex drainage systems proving cost prohibitive;
- 4 Mains drainage mains water and other services should be available as near as possible;
- 5 Soil preferred is a light sandy loam which is easy to work and drains well;
- 6 Land on the side of a steep hill will be difficult and expensive to work. Gently undulating ground often provides the most attractive layout. But this must be balanced with the potential additional costs of laying out the site plus the fact that a smaller percentage of land may be usable for burial;
- 7 Heavily wooded land will be costly to clear and would need to be left for some time to consolidate after tree stumps have been removed; and
- 8 Excessive noise from nearby roads, industrial estates, schools, airfields etc can be both unwelcome and unpleasant for mourners.

11.8 The assessment of the above planning and development considerations are informed by appraisals of the sites through use of aerial images, review of development plan designations, planning history checks and site visits.

11.9 The key points from the site proformas are summarised below. Based on the information obtained a judgement has then been made on the overall acceptability of the site for use as a cemetery.

11.10 The sites considered acceptable for use as a cemetery are then compared in more detail to ensure the most suitable site or sites is recommended to meet the identified need.

## Detailed Site Assessments

### 1. Land to the East of Greenlawn Memorial Park (ES3)

- 11.11 The 4.5 hectare site is situated to the east of Greenlawn Memorial Park, Warlingham within Tandridge District. The site is currently in agricultural use with further agricultural land to the east and the village of Warlingham to the west.
- 11.12 The site, which would be an extension to the existing Greenlawn Memorial Park cemetery, can be accessed through the cemetery although there is a bridleway running between the sites. Whilst access to the site is also possible via Roger Lane (itself accessed from Limpsfield Road to the south), this is only a shared single track road and is therefore an unsuitable public access route. Providing access to the site through Greenlawn Memorial Park will help minimise any impact on the existing residential properties located on Roger Lane.
- 11.13 In terms of wider accessibility, the site and the existing Greenlawn Memorial Park are not easily accessible by public transport with limited access by bus and train. The private car is therefore the primary method of accessing the site.
- 11.14 As a result of this poor access by public transport and given that the site is located outside of LB Croydon (to the north), the ability to meet the needs of the less mobile residents within the Borough especially those located in the north of the Borough is a drawback to the site.
- 11.15 With the exception of the site topography, which may lead to some operational difficulties due to the site sloping down from south to north, we have not identified any significant site constraints or other site character issues which would prevent the use of the site as a cemetery. We have also not identified any availability or viability issues which would prevent this site's development.
- 11.16 Development costs could be reduced by utilising economies of scale as the existing built facilities (e.g. toilets, staff room and maintenance sheds) at Greenlawn Memorial Park would be used to service the extension site.
- 11.17 The site is designated within the Tandridge Local Plan (TLP, 2001) with the Metropolitan Green Belt Land and in an Area of Great Landscape Value, national planning policy guidance states that cemetery buildings are considered appropriate development within the Green Belt (PPG2, para 3.4), as a result this allocation would not prevent the use of this site as a cemetery. We also consider that with sensitive design it is possible to ensure that the landscape character of the area will not be harmed in accordance with TLP Policy RE17. Utilising existing facilities for the extension site (see para 11.9) would also reduce the visual impact of development.
- 11.18 Overall we consider that the site has significant potential for use as an extension to the existing Greenlawn Memorial Park. The site topography and poor public transport access to the site are the only identified issues. The site should therefore proceed to the further site assessment stage of the study.

## **2. Land to the northeast of Greenlawn Memorial Park (ES4)**

- 11.19 This site has been included on the premise that site ES3 is developed. Only then could the site constitute an extension site. The 4.4 hectare site adjoins ES3 (see above) and is located to the north east of Greenlawn Memorial Park. Unlike ES3, the site does not share a boundary with Greenlawn Memorial Park but is bound by ES3 to the south. The site is currently in agricultural use.
- 11.20 The site does not have any direct vehicular access and is physically isolated. It is therefore only capable of being brought into use if ES3 is developed for cemetery use first and access taken through this site. The site has limited bus and rail access and is not close to the most significant need identified in the north of LB Croydon.
- 11.21 The topography of the site rises from south to north with the lowest point of both ES4 and ES3 being the border running east/west between the two. This topography may lead to some operational difficulties.
- 11.22 The site is designated as Green Belt Land and an Area of Great Landscape Value in the TLP.
- 11.23 If ES3 were to be developed, we have not identified any further specific site constraints for ES4. The topography and public transport accessibility issues as previously identified for ES3 are the only development obstacles for ES4. The site should therefore proceed to the further site assessment stage of the assessment on the proviso that its development would be conditional on the simultaneous or prior development of ES3.

## **3. Demesne Road Allotments (ES5)**

- 11.24 The 4 hectare site, which is currently in allotment use, adjoins the existing Bandon Hill Cemetery and would act as an extension to this cemetery. The site is within the built up area of Wallington.
- 11.25 Within the Sutton UDP (April, 2003), the site falls within a Metropolitan Green Chain, a Green Corridor and Wandle Valley Regional Park designations and is allocated as Land Safeguarded for Cemetery Extension.
- 11.26 Since the adoption of the UDP, LB Sutton has published their Site Development Policies Preferred Options Development Plan Document (January, 2010). The document states that the extent of the site was incorrectly shown within the Sutton UDP and that the area to be safeguarded for cemetery use related to a 1.6 hectare strip of land adjacent to the existing Bandon Hill Cemetery and not the entire site. LB Sutton state that the reason for the reduced site size is the presence of mature landscaping in the centre of the site which limits the cemetery's expansion.
- 11.27 Notwithstanding the above proposed site reduction, we understand from LB Sutton that the site is very likely to continue be in allotment use until at least 2018. As a result it is unlikely to become available in the short term and will therefore be unable to meet the immediate need identified.

11.28 On this basis and given the potential reduction in the site area, we have not assessed this site in more detail. We consider that it should be excluded from the further site assessment stage of this study.

11.29 However, the 1.6ha of the site has been identified as suitable for cemetery use and we recommend that LB Sutton and LB Croydon continue to review the possibility of developing all or some this site for cemetery use post 2018.

#### **4. Cane Hill Hospital (C2)**

11.30 The Cane Hill Hospital site consists of approximately 81 hectares. Whilst, parts of the site have been excluded at an earlier sieve stage due to specific constraints, two land parcels within the wider Cane Hill Hospital site have been identified as having potential to accommodate a cemetery. These are identified as Cane Hill North and Cane Hill South and considered below.

##### **4a. Cane Hill North**

11.31 The site measures approximately 23 hectares and is located to the north of the Cane Hill Hospital buildings and south of Coulsdon town centre. The majority of the site is in agricultural use with internal access roads and builders compound for the works on the hospital building also present.

11.32 Despite the site having a number of positive attributes, such as excellent public transport accessibility and good vehicle access, we consider that the site is inappropriate for cemetery use due to its topography. The site has a significant ridge running from south west to east which results in the ground sloping to such an extent that we consider cemetery use would not be operationally possible or would make the site unviable.

11.33 In addition, we understand that a Masterplan for the site is being produced by the Homes and Community Agency (HCA) which may seek to develop the site for higher value housing use. This may be a more appropriate and viable option for the site given its proximity to Coulsdon town centre.

11.34 Given the issue with the site topography and possible conflict with the HCA Masterplan we consider that this site should be discounted from the study.

##### **4b. Cane Hill South**

11.35 The south site measures approximately 8.9 hectares and is located to the south east of the Cane Hill Hospital buildings. The site is currently in agricultural use and occupies an area immediately north of Hollymeoak Road and west of the A23 (Brighton Road).

11.36 Vehicular access to the site could be taken to the north of Hollymeoak Road via an existing site access. Whilst, using this access is likely to increase the level of traffic on a short section of Hollymeoak Road, it is unlikely to cause any significant disturbance to the nearby residential properties given its close proximity to the A23.

- 11.37 In terms of access by public transport this is limited with only one bus route passing the site and the nearest station being 1.3 km away. The ability to meet the needs of the less mobile residents especially those located in the north of the Borough is questionable given the sites location in the south west of LB Croydon.
- 11.38 As with Cane Hill North, the site is not flat with significant slopes from north to south and west to east on parts of the site. However, based on our site visit we consider that there is a reasonably large flat area of over 4ha in size within the south east corner of the site which would be large enough to accommodate a new cemetery.
- 11.39 We have not identified any further site constraints or site character constraints which would prevent the site being used as a cemetery. Positively, the existing site screening provided by mature trees ensures that the site is not overlooked by the residential properties on Hollymeoak Road or traffic on the A23.
- 11.40 Finally, in relation to the Croydon UDP designation, the site is allocated as Metropolitan Green Belt. As set out above Para 11.18 cemeteries can comprise appropriate development within the Green Belt.
- 11.41 Overall we consider that the site has significant potential for use as a cemetery, despite the public transport access issue. The site should therefore proceed to the further site assessment stage of our assessment.

## **5. Land to the Rear of Kingswood Way (C5)**

- 11.42 The site is located to the rear of Kingswood Way in the east of LB Croydon. The site comprises of a number of smaller land parcels to the rear of residential properties on Kersey Drive, Kingswood Way and Ravenshead Close that together cover 4.06 hectares.
- 11.43 At present there is only one narrow private vehicular access into the site. The creation of a new vehicular will necessitate the purchase of additional land and may require the demolition of an existing residential property. As a result the viability of the site is questionable.
- 11.44 In the unlikely event that access could be gained, the increase in traffic would potentially have a detrimental affect on the amenity of the surrounding residential areas which are characterised by quiet residential roads.
- 11.45 From an operational perspective the topography of the site would also potentially result in parts of the site being unusable. Given that the site is marginally over the 4ha minimum site size required, the whole site would need to be used for a new cemetery.
- 11.46 We conclude that development of the site would represent 'backland' development. Inappropriate forms of which are resisted in planning policy.
- 11.47 We therefore consider that this site should be excluded from the study due to the above concerns relating to access, viability and topography.

## 6. Land at Fox Lane/Coulsdon Road (E2)

- 11.48 The Land at Fox Lane/Coulsdon Road site extends to 19 hectares and is principally open land providing a 'green edge' to Old Coulsdon and Caterham in the south west of LB Croydon. Based on our observations, it appears to be well used for recreational purposes such as dog walking.
- 11.49 There are a four points of vehicular access into the site from the Coulsdon Road to the east. The principal access is currently from Fox Lane which consists of a single vehicle width tarmac road. It is likely that this access would need to be upgraded given the increased vehicle demand associated with a cemetery. The other access points through Purley John Fisher Rugby Club, direct from Coulsdon Road and from The Grove would all require improvements. The latter is a narrow residential street that is not considered appropriate. Due to the large size of the site, the location of a new cemetery within it would have to be carefully considered in relation to vehicular access point. The areas of the site furthest from the potential vehicular access points to the west would not be suitable for cemetery use if physically from them.
- 11.50 The site has good public transport links with a number of bus stops on Coulsdon Road adjacent to the site. However, the site is located in the south west corner of LB Croydon a long distance from the most significant need identified to the north.
- 11.51 In relation to the site conditions and site character we have not identified any constraints which would prevent the use of the part of the site as a cemetery. There is a public footpath and bridleway bisecting the site, but given the size of the site, it is reasonable to assume that the proposed cemetery could be positioned to ensure these routes remain open or are otherwise diverted.
- 11.52 A smaller area in the south west corner may be unviable due to the sloping ground.
- 11.53 Finally, the site falls within the Metropolitan Green Belt where cemeteries can be considered as appropriate development.
- 11.54 Overall, balancing all of the factors we consider that the site has significant potential for use as a cemetery and therefore suitable to proceed to the further site assessment stage of our assessment.

## 7. Warlingham Court Farm (E7)

- 11.55 The 39.9 hectare site (14.1 hectares discounted at an earlier sieve stage) is located off Tithepit Shaw Lane to the west of Wentworth Way. The site includes land falling within the south east extent of LB Croydon and Tandridge District.
- 11.56 The site which consists principally of open land is in active recreational use. The site is also entered into the Countryside Steward Scheme (CSS), the objectives of are "to improve the natural beauty and diversity of the countryside, enhance, restore and re-create targeted landscapes, their wildlife

habitats and historical features, and to improve opportunities for public access” as stated on the Natural England website. The development of a cemetery is likely to contradict these aims.

- 11.57 The only vehicular access is located off Tithepit Shaw Lane. The access is situated on a tight bend opposite a secondary school and therefore may not be suitable for the volume of traffic associated with a cemetery. Although the gated access is wide enough to accommodate vehicles it is relatively narrow and may result in conflicts between pedestrians accessing the open space and cemetery traffic if utilised. The close proximity of residential properties and sports pitches restrict the scope to widen the access, as does the likely need to include additional land.
- 11.58 Given that the access from Tithepit Shaw Lane is located in the south east corner of the site, it would be unpractical to locate a new cemetery in the north or west parts of the site. Users of the open space would therefore need access through or around a cemetery in the south east of the site.
- 11.59 It is important to note that the access and southern part of the site lie within Tandridge District, meaning that the need would not be met within LB Croydon.
- 11.60 The Croydon UDP designates the site as Metropolitan Green Belt and as being located within an Archaeological Priority Zone. As set out above cemeteries can be appropriate development within the Green Belt. However, there are long reaching views into and out of the site to the south west and any development would have to be well screened and sited so as to minimise any potential negative visual impact.
- 11.61 In relation to archaeology, this designation does not prevent the site from being considered further in this study but development would be dependant on the results of a desk top study.
- 11.62 Overall, balancing all of the above factors we consider that the site would not be appropriate for cemetery use due to the accumulation of site constraints of the CSS, access, Tandridge District land and visual impact. The site has therefore not been considered in the further site assessment stage.

## **8. Land of Kent Gate Way (E18)**

- 11.63 The 21.5 hectare site is located to the north of New Addington and south of the A2022 (Kent Gate Way). The site is currently in agricultural use.
- 11.64 There are two potential vehicular accesses into the site directly off the A2022 which is a London Distributor Road. However, the eastern access is currently blocked by bollards, forms part of a public footpath and would need to be widened (which would be impractical due to the presence of residential properties either side). The western access is more appropriate. Whilst this access needs to be upgraded as it appears to be currently utilised by agricultural vehicles only, we have not identified any specific restrictions based on our analysis.

- 11.65 The site is highly accessible by public transport being located within walking distance of the Addington Village Bus and Tram interchange to the west. Therefore, although the site is not close to the most significant need identified in the north of LB Croydon there are strong public transport connections.
- 11.66 Potential vehicular access and public transport accessibility could be improved by including the 2.8ha parcel of land immediately west which is bound by Kent Gate Way and Lodge Lane.
- 11.67 We have not identified any site specific constraints which would prevent the use of the site as a cemetery. In relation to the site character the site is overlooked by residential properties to the north and is highly visible from Kent Gate Way as the site rises up to the south. However, we consider that the highly visible nature of the site does not make the site inappropriate for cemetery use but that the development of the site would necessitate appropriate screening to be put in place.
- 11.68 In relation to viability, the site's topography may lead to operational difficulties but we do not consider that this would prevent the site being used as a cemetery. The site does slope down from south to north and west to east in parts but it is envisaged that a larger enough 'flatter' area could be utilised for cemetery use given the large site area.
- 11.69 Finally, the Croydon UDP designates the site as lying within the Metropolitan Green Belt and an Archaeological Priority Zone. As set out above, cemeteries can be considered appropriate development within the Green Belt. In relation to archaeology, this designation does not prevent the site from being considered further in this study but development would be dependant on the results of a desk top study.
- 11.70 Overall, balancing all of the factors we consider that the site has significant potential for use as a cemetery and therefore suitable to proceed to the further site assessment stage. The site should also be extended to include land immediately west as identified above.

## **9. Ashburton Park (E52)**

- 11.71 Ashburton Park is 7.4 hectares in size and is located to the north of the Borough. The park contains a number of well used recreational, sporting and community facilities. In addition, the park hosts various temporary events such as a fair and firework display. The park is in a built up area of Croydon.
- 11.72 The site is highly accessible by public transport and is ideally situated to meet the significant burial need identified within the north of LB Croydon. However, it is clear from our site visit that the park is a well used vital green space within this high density residential area.
- 11.73 Given the popularity of the park and strong protection of sporting and recreational uses in built up areas, we consider that this site should be excluded from the further site assessment stage.

## Results

11.74 Based on our detailed analysis of the sites we consider that the following four sites are potentially suitable for burials use:

- 1 Land to the east and north east of Greenlawn Memorial Park (ES3 and ES4 combined)
- 2 Cane Hill South (C2)
- 3 Land at Fox Lane/Coulsdon Road (E2)
- 4 Land off Kent Gate Way (E18)

## Capacity of Site Options

11.75 The potential for the above sites to meet all of the burial need identified in Chapter 6 has been explored in order to establish whether one or more sites will need to be developed to meet the identified need.

11.76 To calculate the estimated potential capacity of the sites we need to first establish an approximate estimated burial density per hectare. To estimate the burial density we have calculated the average density of Mitcham Road Cemetery, Greenlawn Memorial Park and Bandon Hill Cemetery (See Chapter 4). We have deliberately excluded Queens Road Cemetery as its density is particularly high at 3,932 burials per hectare. We consider that this can be attributed to the age of the cemetery, historical burial practices and significant intensification.

11.77 Based on the three cemeteries the current average burial density is 2,528 per hectare. However, given increases in plot size, the need to provide lower density Muslim burial plots and based discussions with LB Croydon Bereavement Services estimates, we consider that a cautious approach should be adopted. We have therefore reduced the estimated burial density to 2,000 burials per hectare.

11.78 Using a density figure of 2,000 burials per hectares the capacity of the potential cemetery sites has been calculated (see Table 24 below). For the purpose of this exercise, we have assumed that the entire potential cemetery sites can be developed for cemetery use. The Greenlawn Memorial Park extension sites (ES3 and ES4) have also been combined, as they are two extensions of the same site and ES4 can not be developed without developing ES3 (see paras 11.16 and 11.20).

Table 11.1 Potential Cemetery Site Size and Capacity

Site	Size (Ha)	Capacity
Land to the east and north east of Greenlawn Memorial Park (ES3/ES4)	8.9	17,800
Cane Hill South (C2)	8.9	17,800
Land at Fox Lane/Coulsdon Road (E2)	21.5	43,000
Land off Kent Gate Way (E18)	21.5	43,000

11.79 It is evident from Table 24 that all of the identified need (9,993 burials) to 2031 and beyond is capable of being met through the selection of one of the above potential sites.

## Further Site Assessment

11.80 To inform the final recommendations of the study the four sites have been assessed in more detail.

## Methodology

11.81 The results of the further site assessment have been collated into site proformas (**Appendix M**) and a table of 'pros' and 'cons' with accompanying plans and photographs (**Appendix N**).

11.82 We have assessed these four sites further by analysing the headline indicators used for the detailed options assessment (para 11. 4) in more depth. In doing so, we have undertaken:

- Further consultation with LB Croydon
- Further map based analysis using street plans and Ordnance Survey Landranger maps
- Critical assessment of potential access arrangements (vehicular and pedestrian) and accessibility

11.83 In addition, given that three of the sites are in agricultural use we have identified the Agricultural Land Classification (where applicable) using the online mapping system available at MAGIC.

11.84 This information, and that which has been obtained through the detailed options assessment, has been used to give a 'pro' 'neutral' or 'con' rating for each planning consideration for each of the four sites. The reasoning behind each rating is included in the comment beneath the rating within the table. The table is accompanied by two maps (proposals map and OS Landranger extracts) and photographs to demonstrate key issues. This method has been chosen to allow the sites to be clearly presented and assessed in a comparative way.

- 11.85 The land off Kent Gate Way site has been extended to the west to cover a total area of 24.3ha (see E18 maps in appendices M & N), as recommended in the detailed site assessment.

## Results

- 11.86 The following paragraphs identify the key comparative pros and cons of each site and should be read alongside the Further Assessment Table and Proformas (**Appendix N**).
- 11.87 Land east of Greenlawn Memorial Park scores well in terms of the site character (gently sloping and well screened) and compatibility with surrounding land uses, there are also a number of economies of scale to be realised from its location adjacent to an existing cemetery. The drawbacks of the site are its relatively weak public transport links, designation as an Area of Great Landscape Value and, most importantly, its location outside of the administrative area of LB Croydon and furthest from the identified area of most need in the north of the Borough.
- 11.88 Cane Hill South scores well in terms of planning context due to its potential to come forward as part of a comprehensive plan for the wider Cane Hill Hospital site. The site is also in close proximity to the main road network via the A23. However, accessing the site from Hollymeoak Road is problematic given the road width, gradient and proximity of the existing agricultural access to the A23. In addition, the site has the most significant slope of all of the sites and the steep west to east slope seriously restricts its cost effectiveness and operational desirability as burial land.
- 11.89 There are a number of options to provide vehicular access into land at Fox Lane/Coulsdon Road and it is the only site with an existing car park. However, the site is well used for recreational purposes, with a number of public footpaths and bridleways restricting the potential developable area, and it also lies adjacent to an Area of Great Landscape Value.
- 11.90 Land off Kent Gate Way lies closest to the area of burial need in the north of the Borough and is the most accessible. These two factors, when combined, are significant in terms of London Plan Policy 3D.19. The site is also accessible to the main road network (via the A2022) and in close proximity to the New Addington tram and bus interchange which has established controlled pedestrian links to the west boundary of the site. The (expanded) site takes advantage of these pedestrian links and allows the possibility of vehicular access from the Kent Gate Way roundabout or Lodge Lane. An alternative access option is from Kent Gate Way with a new filter lane for vehicles approaching from the west and turning right into the site. Drawbacks to the site comprise the low water table at Kent Gate Way and the presence of a water pumping station, the gradient of the site which may restrict its operational capabilities and overlooking by some residential properties in New Addington.

- 11.91 This planning analysis and comparative assessment of the sites leads us to identify land off Kent Gate Way, as the preferred site for new burial use.

## **Preferred Options Additional Assessment**

- 11.92 The preferred options have been derived from a series of sieves and site specific assessments. However, in deciding which site to promote through the LDF process, we suggest additional detailed assessment is required in respect of three planning matters for which assessment was relatively limited: namely; hydrology, archaeology and deliverability.

### **Hydrology**

- 11.93 LB Bereavement Services have highlighted the importance of hydrology to a potential burial site. Turftrax completed a Tier 1 Hydrological Risk Assessment for part of the land east of Greenlawn Memorial Park (ES3) in November 2007. The study concluded that, subject to agreement from the Environment Agency and a number of further assessments/mitigation measures, the land could be used for burials. This study should be extended to include the remainder of the site.
- 11.94 At Kent Gate Way, we have been advised by LB Croydon that there is high water table and there have been flooding issues in the recent past at a nearby site to the east. The site falls within Flood Risk Zone 1 on the online Environment Agency maps (the lowest risk classification) and lies adjacent to a Thames Water pumping station. We have not identified any specific restrictions on development adjacent to water pumping station, beyond the need to investigate potential flood risk and aquifer contamination. Detailed site investigation into the potential flood risk, drainage and water contamination should be undertaken as part of a hydrological investigation.

### **Archaeology**

- 11.95 An Archaeology evaluation of the part of the land east of Greenlawn Memorial Park site (ES3) was undertaken by Surrey Archaeological Unit in May 2005. The preliminary investigation identified a number of archaeological features on the site, none of these preclude cemetery use but the report recommendations and written specification for further archaeological work would need to be agreed and progressed. Should the remainder of this site be developed then the study area should be extended accordingly.
- 11.96 The land at Kent Gate Way falls within a designated Archaeology Priority Zone and a full archaeological assessment and investigation is required prior to any development, consistent with CUP Policy UC11.

### **Deliverability**

- 11.97 LB Croydon advise that there are no legal constraints exist in relation to the land east of Greenlawn Memorial Park.

11.98

We have also been advised by LB Croydon Property Services that the land off Kent Gate Way is subject to an Agricultural Holdings Act lease and a conveyance covering a wider area. The Agricultural Holdings Act lease comprises a yearly tenancy. In order to terminate this lease, LB Croydon must serve notice of at least twelve months expiring at the end of the year of the tenancy. We understand from initial investigations by LB Croydon that the wider conveyance does not identify any prohibitive restrictions, and the Council is to satisfy itself that this is confirmed.

## 12.0 **Conclusions and Recommendation**

- 12.1 This study has assessed the future burial requirements of the residents of LB Croydon, and the potential spatial options for meeting that level and nature of burial need, to provide the required LDF evidence base.
- 12.2 The Ministry of Justice has highlighted the pressures, within London in particular, that Local Authorities face in providing municipal burial facilities. This could be exacerbated by the potential increase in full body burial demand in the future, including that required to meet specific religious requirements.
- 12.3 The provision of burial facilities is not a mandatory requirement for Local Authorities at present. However, many have historically carried out this function and Local Authorities have various legislative powers relating to burial land provision. There is also growing planning policy recognition at regional and local level of the importance of protecting existing facilities and promoting new facilities to meet identified need.
- 12.4 There are currently two public cemeteries within LB Croydon, used by the Local Authority: one at Mitcham Road, which is the largest facility (and home to the administrative functions of Bereavement Services) and one at Queens Road. Both are in north Croydon. LB Croydon also use additional cemeteries at Greenlawn Memorial Park (in Tandridge) and Bandon Hill (in LB Sutton).
- 12.5 Targeted stakeholder consultation identified that these public facilities do not meet their needs. However, consensus on how to increase supply or any opportunities for joint working (with neighbouring authorities) were not identified.
- 12.6 The quantitative need assessment identified there to be a demand for 5,824 full body burials (FBB) and 3,411 burials of cremated remains (BCR) in Croydon Borough during the period 2009-31. Scenario testing demonstrated a hypothetical potential for a 20% increase in FBB and 2.5% increase in BCRs in the same period. Within this provision, demand for 1,186 burial plots for the growing Muslim population has also been identified.
- 12.7 This baseline demand will outstrip supply within two years, resulting in a very significant residual need over the period 2011-2031. A need for up to 9,933 FBBs and BCRs has been identified to 2031, excluding any pandemic requirements, i.e. broadly 10,000 burials (6,500 FBB / 3,500 BCR) or 500 per year over the next 20 years.
- 12.8 In considering the potential choices to meet the identified need, the following options have been assessed:
- Intensification – This method alone would not meet the identified need due to specific religious requirements and personal preferences, however, the continued reclamation of graves is recommended to increase capacity.

- Extensions to existing sites – Ten potential sites were identified and considered against feasibility and deliverability sieves, our analysis of the potential to extend existing cemeteries used by LB Croydon identified potential options at Greenlawn Memorial Park and Bandon Hill (all three sites lie outside LB Croydon).
- New sites – 126 sites were identified using various databases provided by LB Croydon, a first sieve based on feasibility and deliverability reduced this to 31 and a second, based on a site specific extension to the first sieve, identified six sites for detailed assessment.

12.9 Detailed assessment of the nine sites (three ‘extensions’ and six ‘new’) covered planning context, transport, accessibility, site condition, site character and sustainability considerations. The results of this assessment identified four potential suitable burial sites; namely, land to the east of Greenlawn Memorial Park, Cane Hill South, Land at Fox Lane/Coulsdon Road and Land off Kent Gate Way. Each of these sites is capable of meeting all of the identified need to at least 2031.

12.10 Our detailed and further assessment of these site options found that:

- Land to the east of Greenlawn Memorial Park – Burial use would be compatible with neighbouring land and there are significant economies of scale to be realised from Greenlawn Memorial Park. Initial ground investigations have not identified any restrictions. However, the site is located outside of LB Croydon, has relatively poor public transport links and lies in an Area of Great Landscape Value. Additionally, access over an existing bridleway is required.
- Cane Hill South – The site is accessible to the road network and has the potential to come forward as part of a wider development of Cane Hill. However, the access difficulty and the significant slope of the site are considerable drawbacks.
- Land at Fox Lane/Coulsdon Road – Although accessible, the site is well used for recreation, has a number of rights of way running across it, had significant areas of standing water on site and lies adjacent to an Area of Great Landscape Value.
- Land off Kent Gate Way – This site is best positioned to meet the identified need in Croydon and is the most accessible. However, selection of this site should be dependant on the results of detailed investigation into hydrology and archaeology, given the potential constraints identified.

12.11 Only one of these four potentially suitable burial sites is required to meet the identified need for 10,000 burial plots in LB Croydon in the 2011-31 period. For any of these sites, excluding Greenlawn (ES3), to be promoted for burial use in the LDF, a further (Tier 1) hydrology assessment and (preliminary) archaeological investigation are recommended to determine their overall suitability or otherwise. It is also recommended that a full title investigation is undertaken of the Cane Hill South and Fox Lane/Coulsdon Road sites, consistent with that undertaken for the other two sites..

- 12.12 We recommend that LB Croydon select land off Kent Gate Way as the preferred option for a new burials site, subject to the findings of more detailed hydrology and archaeology investigations.
- 12.13 We also recommend that LB Croydon:
- Continues the current practice of reclaiming graves, undertakes further research into the number of graves that can be reclaimed and explores the possibility of reusing graves; and
  - Explores, on a joint working basis with LB Sutton, the possibility of using some or all of the Demesne Road allotment site for cemetery use, as an extension to Bandon Hill Cemetery post 2018..
- 12.14 The reclamation and reuse of graves, together with possible shared use of any extension to Bandon Hill Cemetery post 2018 would reduce the need for future burial plots to 2031. However, as reclamation/reuse is estimated to potentially provide around 2,000 burials and given the lack of certainty of Bandon Hill becoming available post 2018, there will always be a need to identify and secure a new or extended site in the short term. This is principally to provide the required quantum of capacity (i.e. 10,000 burials), but it also provides the opportunity to provide more choice of burial options, including perhaps the possibility of 'natural burials'.
- 12.15 Finally, we recommend that this report and subsequent investigations are used to assist Croydon Council to select one option to underpin its Core Strategy burials policy and, if Kent Gate Way is chosen, the Site Allocations DPD too.



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