Crematorium Need Assessment

A New Crematorium at Turners Hill

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This report has been read and approved for submission to MSDC by Andrew Tabachnik QC of 39 Essex Chambers

1 Executive Summary

1.1 This report demonstrates that there is a compelling quantitative and qualitative need for a new crematorium, located at Turners Hill in Mid Sussex District.

1.2 Drive-time catchment analysis using the latest available data on population levels in 2018 reveals the significant numbers of people who live closer to the proposed Turners Hill Crematorium than to any other crematorium:

- **11,755** people live within 15 minutes' drive-time, including
- **10,008** living within 15 minutes' drive-time of a crematorium for the first time
- **88,305** people live within 30 minutes' drive-time, including
- **43,532** living within 30 minutes' drive-time of a crematorium for the first time
- **122,916** people live within 45 minutes' drive-time

1.3 Residents of Mid Sussex District are primarily served by crematoria at Crawley and Brighton, with 33% of the population living within a 30 minute drive-time of these crematoria at funeral speeds. However, 53% of the population of Mid Sussex District live within a 30 minute drive-time of the proposed new Turners Hill Crematorium.

1.4 In the Essington Planning Appeal decision[1], the Inspector stated that a crematorium operating above 80% of its practical capacity makes it difficult to offer a cremation service that meets an acceptable quantitative standard. In addition, he stated, "*need is not simply demonstrated by a blackletter calculation ... qualitative issues are a manifestation of quantitative deficiencies…Given that slot times are 45 minutes it is likely that there will often be four funeral parties on site at any given time. This results in a conveyor-belt experience for mourners. This is clearly deficient given the sensitivities which surround the grieving process."*[2]

[1] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire para 215
[2] Ibid para 216

1.5 In the four years 2016 to 2019, Surrey and Sussex Crematorium operated on average at 130% of practical capacity in peak months; Woodvale Crematorium operated at 115%; The Downs Crematorium operated at 125% and Kent and Sussex Crematorium operated at 133%.

1.6 The proposed new Turners Hill Crematorium would create new additional capacity for up to 6 funeral services per weekday at preferred core times of the day. Based upon drive-time catchment analysis, the new crematorium is expected to undertake approximately 877 cremations per year once established, when it would be operating at only 66% of its practical capacity during peak months.

1.7 The new crematorium would offer additional choice for people to arrange a funeral on their preferred date and time in closer proximity to where they live than existing crematoria.

1.8 The 60 minute service interval offered in the single chapel, combined with far fewer funerals taking place than at existing crematoria, would result in greater privacy for each funeral party and the all-important avoidance of the 'conveyor belt' experience so common at existing over-capacity crematoria.

1.9 Evidence from the Office for National Statistics (ONS) indicates a significant and sustained growth in the population and numbers of deaths within the local authority areas served by the existing crematoria. There is a clear and compelling quantitative need for addition crematoria provision and the location of the proposed Turners Hill Crematorium will enable it to meet the current and future needs of a significant and growing population.

1.10 A sample of 200 obituaries reveals an average delay between death and funeral of over three weeks at existing crematoria serving the area, with an average of 44% of funerals delayed even longer. The projected increases in numbers of deaths in the area will inevitably lead to extended delays without additional crematoria provision.

1.11 The proposed new Turners Hill Crematorium will reduce delays between death and funeral through offering new additional capacity; reduce the funeral journey time for many thousands of people; improve mourners' experience through the design and quality of its facilities; and provide greater choice for local people wishing to arrange a cremation.

1.12 In spite of their workload during the coronavirus pandemic, four out of twenty Funeral Directors invited managed to complete a questionnaire, with the questions and responses shown in the Appendix to this report.

1.13 100% consider that a new crematorium at Turners Hill would provide greater choice and availability of service times to bereaved people and Funeral Directors than is currently available.

1.14 75% consider that:

- a new crematorium at Turners Hill would reduce funeral journey times for people in the area;
- 60-minute service intervals at a new crematorium at Turners Hill would be a benefit to mourners;
- there are not enough crematoria in the area to meet foreseeable future need.

1.15 50% consider that:

- there are not enough crematoria in the area to meet current need;
- when making a booking the preferred day and time is not usually readily available;
- existing crematoria do not have sufficient core time capacity;
- a new crematorium is needed at Turners Hill to better serve the needs of people in the area;
- a new crematorium at Turners Hill would be well located to meet the needs of Funeral Directors serving the people in the area.

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4. Introduction

4.1 This report examines the quantitative and qualitative need for a new crematorium located at Turners Hill Road, Turners Hill RH10 4PB in Mid Sussex District.

4.2 Quantitative need focuses upon the population and numbers of deaths within crematoria catchment areas and the capacity of existing crematoria to accommodate current and future demand for cremation.

4.3 Qualitative need focuses upon the current and future capacity of existing crematoria in the area to meet demand for funerals at preferred (core) times; the length of time between death and being able to arrange a cremation at a convenient time; the journey time to the crematorium and the experience of bereaved people once they are at the crematorium.

4.4 Quantitative and qualitative need have a degree of mutual impact.

4.5 This report includes an initial summary of the national context of demand for cremation in the UK, before examining the need for a new crematorium at Turners Hill.

4.6 This report utilises the latest data available, including:

- Data released by the Office for National Statistics (ONS) on population and deaths by Lower Super Output Area (LSOA) in 2018;
- ONS 2018-based subnational population projections;
- Cremation statistics from the Cremation Society of Great Britain;
- Information gained through Freedom of Information requests
- Responses to a survey questionnaire of Funeral Directors

5. The author

5.1 I am Peter Mitchell and I have worked in the Bereavement Services sector for more than 37 years, initially working at all levels from operations to management in both public and private sector cemeteries and crematoria. I managed two public sector and two private sector crematoria in different parts of the UK between 1986 and 2002. These sites included the Surrey and Sussex Crematorium at Crawley.

5.2 In addition to my full-time employment, I was also both the Law Tutor (9 years) and Technical Officer (5 years) for the Institute of Burial and Cremation Administration (IBCA), now the Institute of Cemetery and Crematorium Management (ICCM), for which I also served as a Director. In 1987 I gained the Institute's Diploma and I was elected a Fellow of the ICCM in 2001.

5.3 Since April 2002, I have been an independent consultant specialising in all matters relating to burial, cremation and exhumation.

5.4 Within an extensive range of consultancy projects, I have completed feasibility studies into new crematoria, cemeteries and green burial sites and also strategic and operational reviews of existing facilities. I have also completed Need Assessment reports in support of planning applications and planning appeals for both new crematoria and cemeteries and I have appeared as an expert witness at Planning Inquiries.

5.5 I am an expert in this sector and have built my reputation upon not only my expertise, but also my complete independence, which are both reflected in this need assessment report.

6 The national context of demand for cremation

6.1 The first public crematorium in the UK opened at Woking in 1885 and carried out only 3 cremations that year. The second crematorium opened in 1892 in Manchester. For many years, cremations continued to represent a very small proportion of funerals in the UK. However, as more crematoria were built in different locations, cremation became more readily available as an option and was selected by an increasing number of bereaved people.

6.2 In **2018**, cremation accounted for **81.3%** of all funerals in England, with an overall UK rate of 78.4%. There can be local variation from these national average figures.

6.3 The number of deaths, the development of crematoria and the number of cremations undertaken each year should be viewed within the context of demographic and other factors. These include improvements in healthcare, diet, lifestyle and disposable income that have contributed to significant decreases in death rates during the 20th century.

6.4 Figures 1, 2, and 3 below present data in graphical format to illustrate deaths in the UK since 1885, combined with the changing patterns of demand for burial and cremation. The sources of these data are the Office for National Statistics (ONS) and the Cremation Society of Great Britain.

6.5 All three charts use data from across 133 years and reveal distinct trends.

6.6 Figure 1 below illustrates the annual numbers of deaths, burials and cremations in the UK between 1885 and 2018.

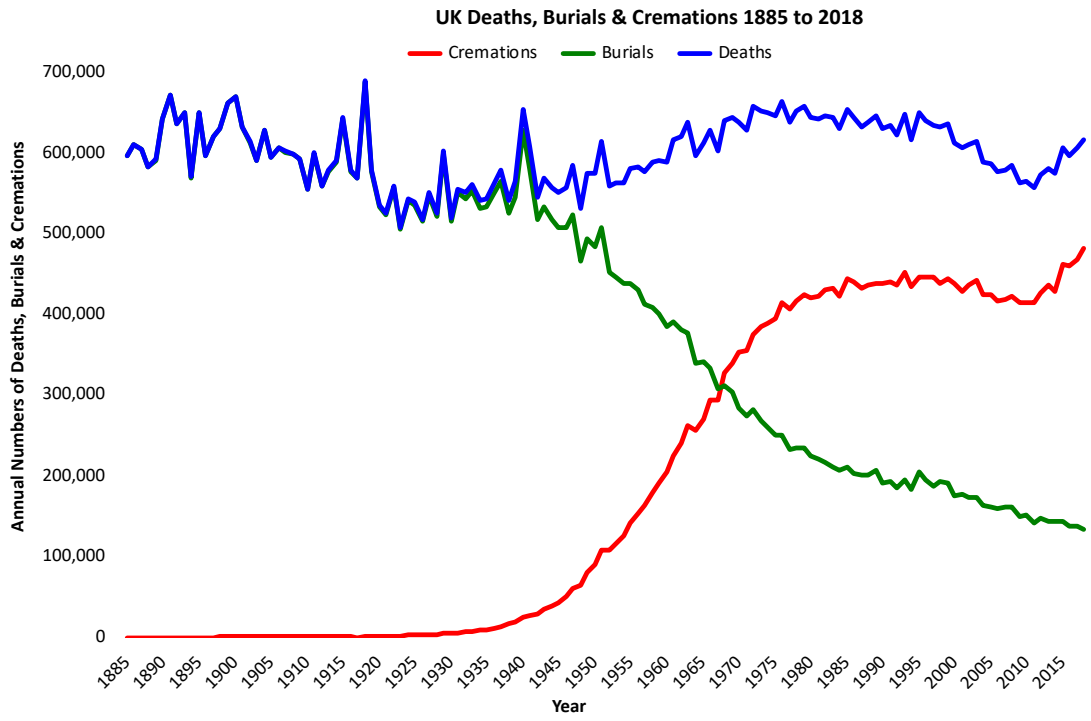


Figure 1: Annual numbers of deaths, burials and cremations in the UK between 1885 and 2018

6.7 Figure 1 illustrates:

- The dramatic increase in the number of cremations since 1940;
- The corresponding significant decline in the number of burials;
- The noticeable decline in the number of deaths from a peak in the 1980s;
- The increase in the number of deaths and cremations beginning in 2012.

6.8 Figure 2 below illustrates the annual numbers of deaths, burials and cremations in the UK, but focuses on the years 2010 to 2018.

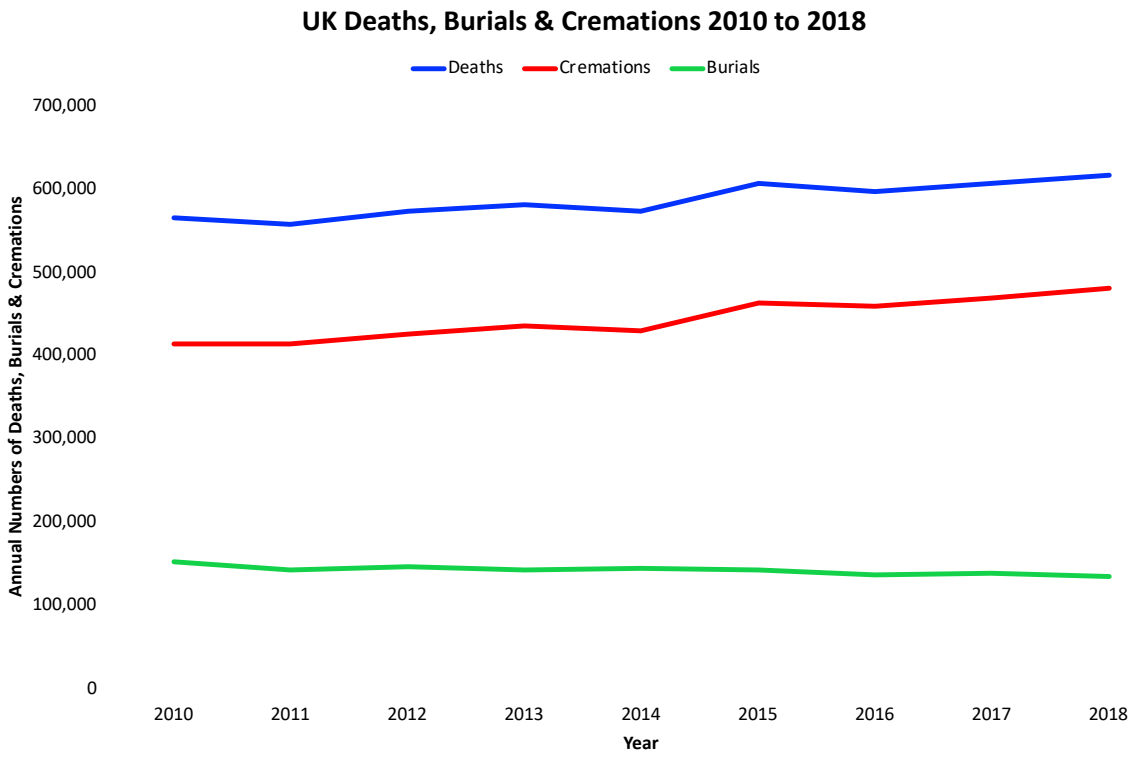


Figure 2 Annual numbers of deaths, burials and cremations in the UK between 2010 and 2018

6.9 Figure 3 below illustrates the proportions of deaths in the UK between 1885 and 2018 resulting in burial and cremation.

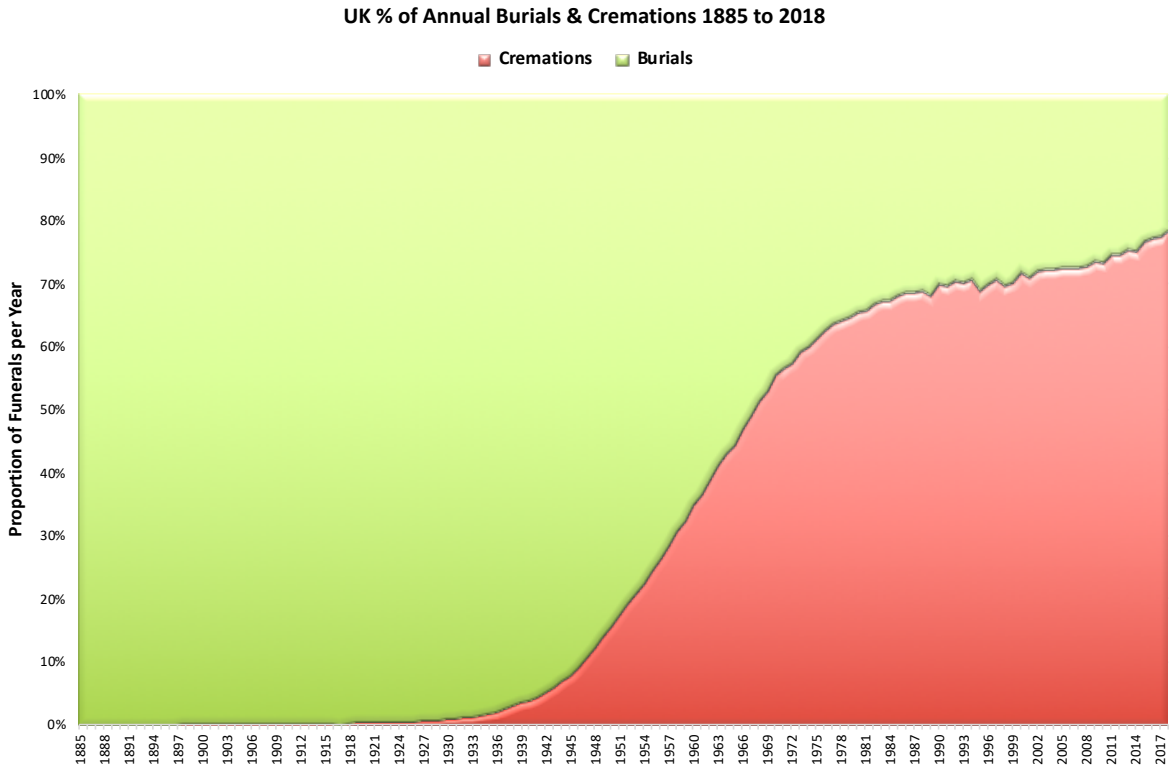


Figure 3: Annual percentages of burials and cremations in the UK between 1885 and 2018

6.10 Figure 3 illustrates:

- The dramatic increase in the proportion of deaths resulting in cremation between 1940 and 1970;
- The sustained increase in the proportion of deaths resulting in cremation since 1970, despite falling numbers of deaths illustrated above in Figure 1.

6.11 Figure 4 below juxtaposes the development of crematoria and the number of cremations in each year between 1885 and 2018.

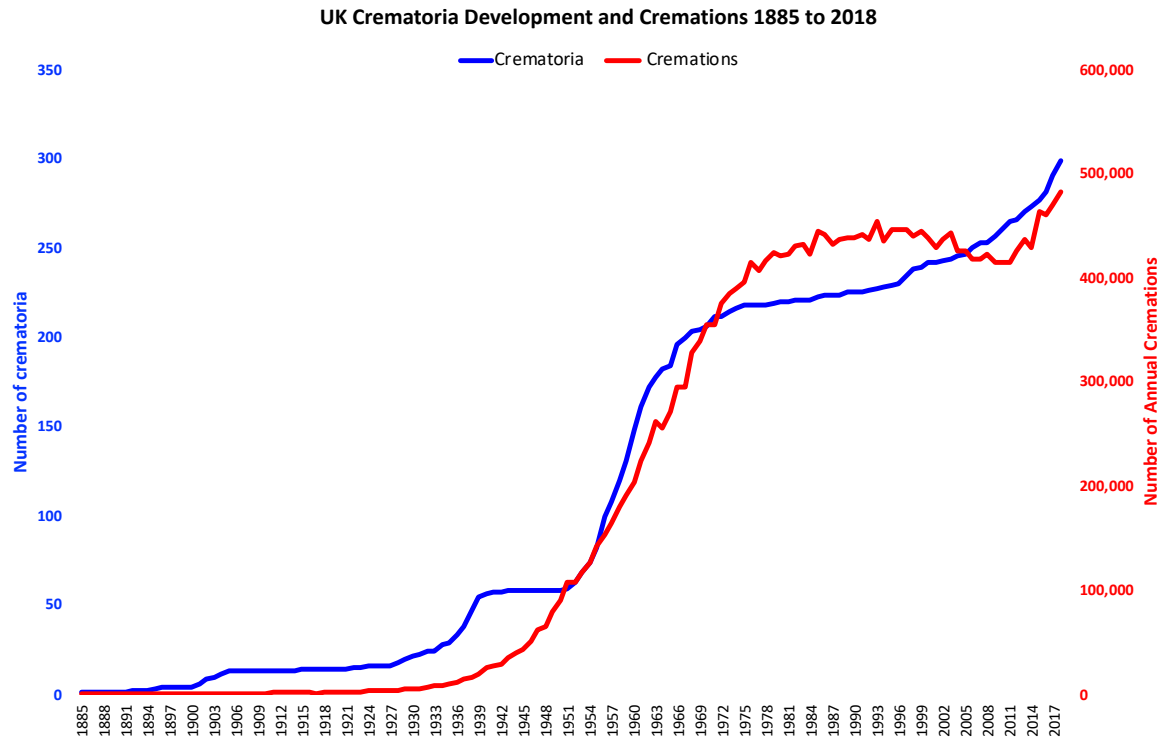


Figure 4: UK Crematoria Development and Cremations 1885 to 2018

6.12. Figure 4 illustrates:

- The close link between the availability of crematoria and the number of cremations;
- The pre-war surge in crematoria construction, with 35 crematoria built during the 1930s;
- The post-war boom in crematoria construction, with 73 crematoria built in both the 1950s and 1960s;
- The further surge in crematoria construction since 2000. In the decade commencing in 1990, 14 were built; in the decade commencing in 2000, 17 were built. 37 new crematoria have been built since 2011 and more are at the planning and construction stages.

6.13 The continued development of new crematoria is necessary, both to cater better for current demand and also to meet significant growth in future demand. The chart below at Figure 5 combines ***actual*** deaths 1885 to 2018 with the ONS 2018-based national population ***projections*** for deaths from 2018 to 2117 for the UK.

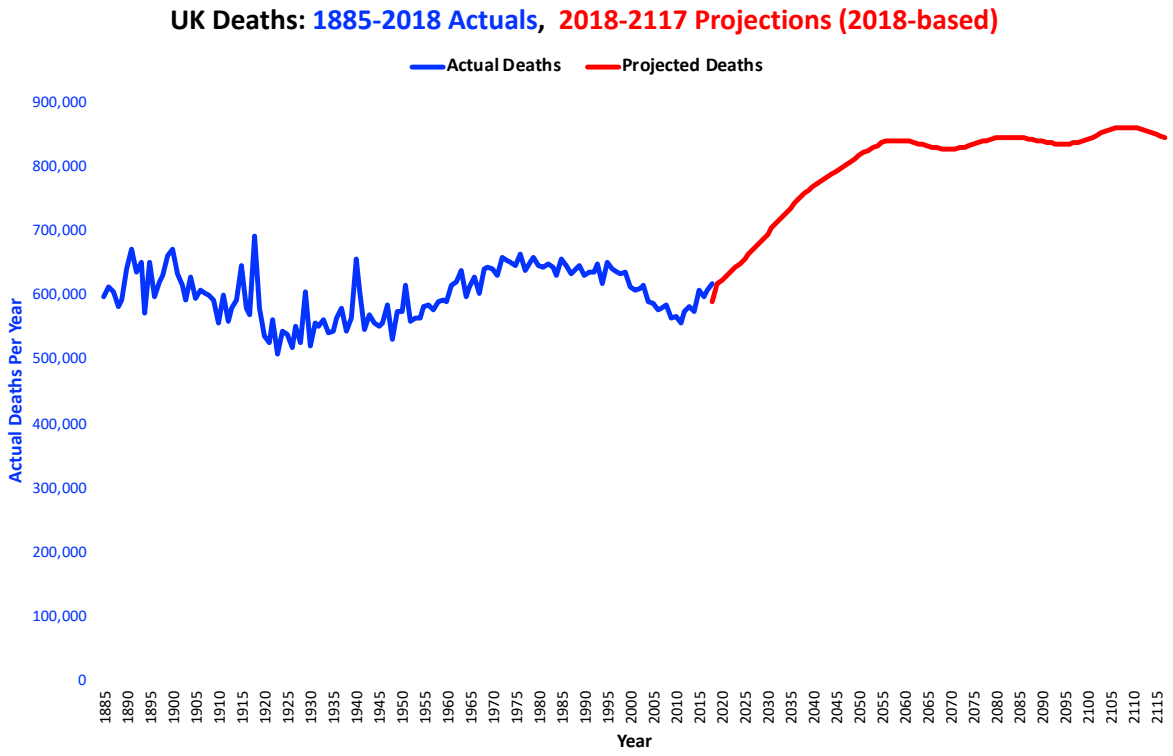


Figure 5: ONS UK Deaths: 1885-2018 ***Actuals*** *and 2018-2117* ***Projected***

6.13 Figure 6 below summarizes this projected increase in the number of deaths, as contained within the ONS 2018-based estimates, published in March 2020:

Actual and Projected Annual UK Deaths			
2018 (Actual)	**2117 (Projected)**	**Variation**	
616,009	844,854	**228,455**	**37.1%**

Figure 6: ONS 2018-based projected deaths 2018 to 2117

6.14 Figures 1 to 6 above provide clear evidence that additional new crematoria are required to meet the sustained and increasing demand for cremation in the UK.

7 The local context of demand for cremation in Mid Sussex

7.1 Figure 7 below illustrates ONS numbers of deaths in 2018 by quinary age band in the catchment local authorities served by the proposed crematorium at Turners Hill.

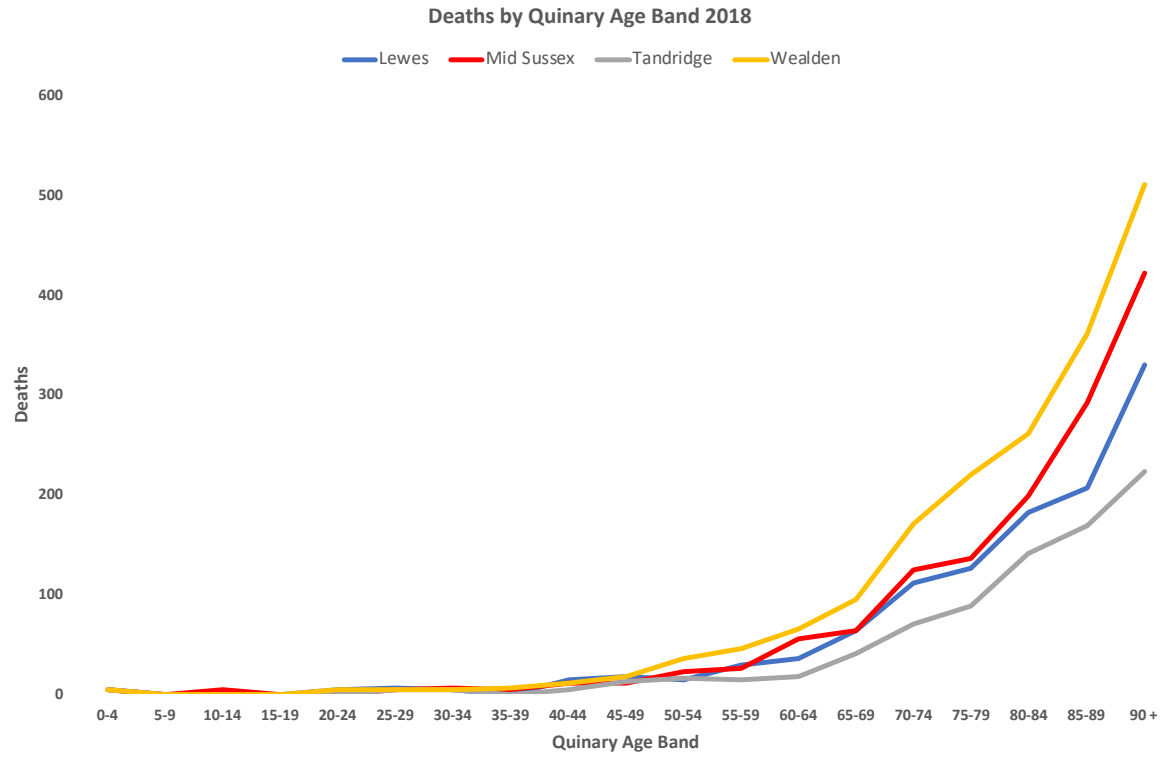


Figure 7: Deaths by quinary age band in 2018 in catchment local authorities

7.2 Figure 8 below also shows the statistical link between increasing age and death by tabulating the proportions of total deaths in two broad age bands in these same local authority areas, with England as a whole for comparison.

Local Authority	0 to 64 years		65 years & over	
Lewes	131	11.4%	1,018	88.6%
Mid Sussex	150	10.8%	1,235	89.2%
Tandridge	80	9.9%	729	90.1%
Wealden	202	11.1%	1,614	88.9%
Totals	**563**	**10.9%**	**4,596**	**89.1%**
England	77,089	15.2%	428,770	84.8%

Figure 8: Proportions of deaths in 2018 by two broad age bands

7.3 Figure 9 below illustrates the ONS 2018-based projected growth in the population **aged 65 years and over** in the same local authority areas between 2020 and 2043, with England as a whole included for comparison.

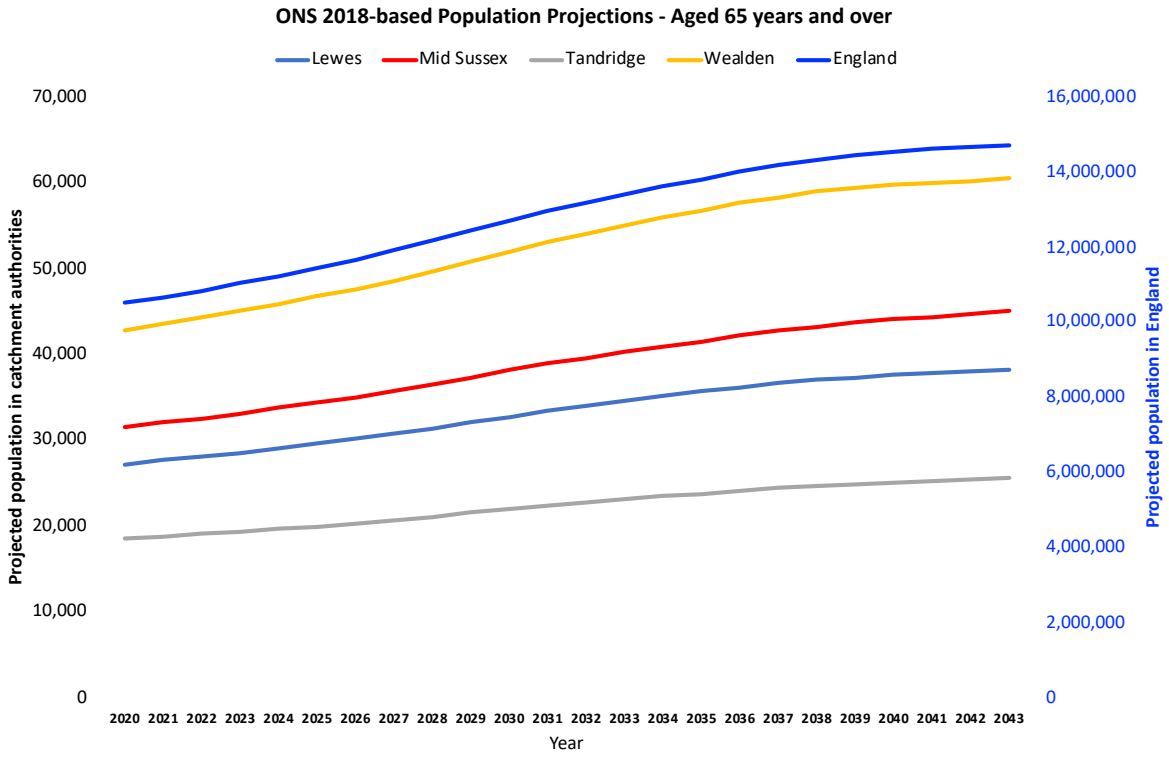


Figure 9: ONS 2018-based projections for the population aged 65 years and over 2020 to 2043

7.4 Figure 10 below tabulates the same data to further illustrate the significant growth in the projected numbers of people **aged 65 years and over** between 2020 and 2043.

Area	Projected Population		Projected Variation	
	2020	2043	2020 to 2043	
Lewes	27,204	38,166	10,962	**40.3%**
Mid Sussex	31,583	45,023	13,440	**42.6%**
Tandridge	18,594	25,545	6,951	**37.4%**
Wealden	42,832	60,529	17,697	**41.3%**
Subtotals	**120,213**	**169,263**	**49,050**	**40.8%**
England	10,505,333	14,726,968	4,221,635	**40.2%**

Figure 10: ONS 2018-based projected growth in the population aged 65 years and over, 2020 to 2043

7.5 Figure 11 below illustrates for the catchment local authorities the ONS 2018-based projections for annual deaths (**at all ages**) between 2020 and 2043.

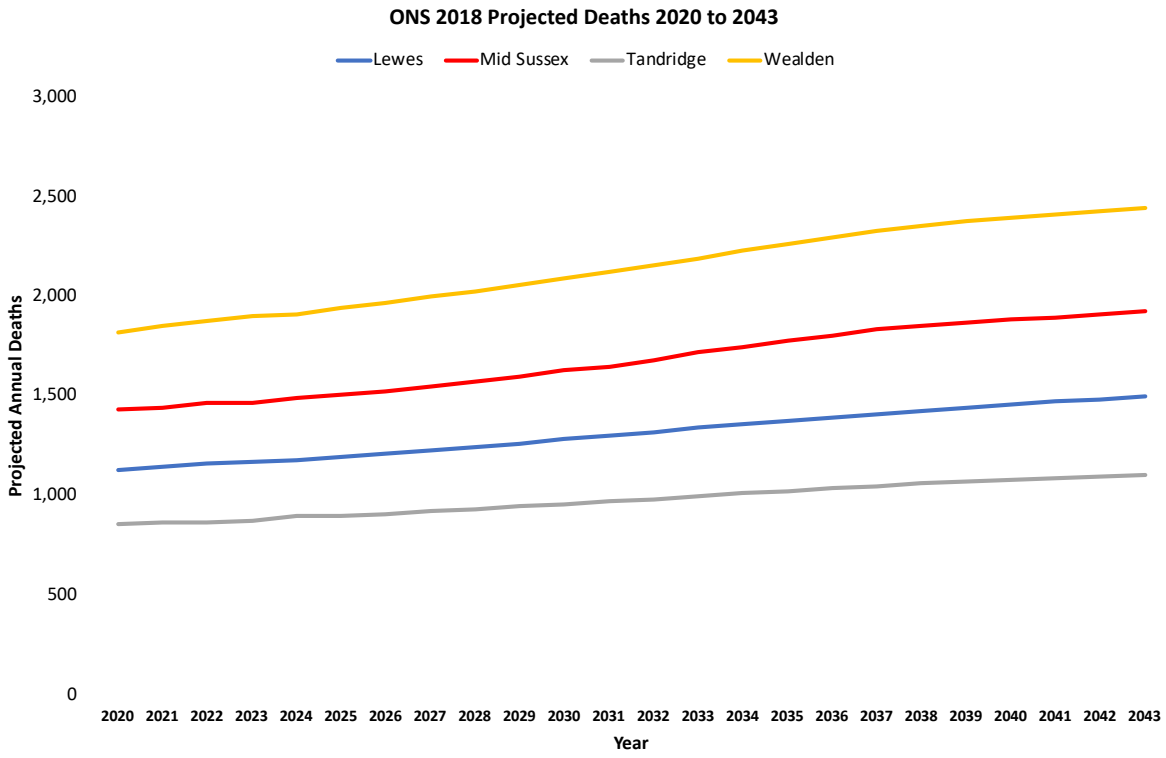


Figure 11: ONS 2018-based projections for annual deaths 2020 to 2043

7.6 Figure 12 below tabulates the same data to illustrate the significant increase in projected numbers of deaths in each local authority area, and in England as whole for comparison, between 2020 and 2043.

Area	Projected Deaths		Projected Variation	
	2020	2043	2020 to 2043	
Lewes	1,130	1,496	366	**32.4%**
Mid Sussex	1,430	1,924	494	**34.5%**
Tandridge	857	1,109	251	**29.3%**
Wealden	1,818	2,447	629	**34.6%**
Subtotals	**5,235**	**6,975**	**1,740**	**33.2%**
England	509,540	648,695	139,155	**27.3%**

Figure 12: ONS 2018-based projected increase in numbers of deaths 2020 to 2043

7.7 The ONS data on population and deaths illustrated in Figures 7 to 12 above provide clear evidence that:

- Approximately 89% of deaths in the catchment local authorities are of people aged 65 years and over.
- The population of these same areas aged 65 years and over is projected to increase significantly across these local authority areas, by between 37% and 43% by 2043.
- The number of deaths of all ages in this same area is projected to increase significantly, by between approximately 29% and 35% by 2043.

7.8 This demographic context underlines the need for the new crematorium at Turners Hill in order to meet both the current and future quantitative and qualitative need for cremation among the growing and ageing local population.

8. Quantitative need for Turners Hill Crematorium: drive-time catchment analysis

8.1 Quantitative need is established by quantifying the population that would be in closer proximity to the new crematorium than to existing crematoria and examining the current and future capacity for funerals available at existing crematoria.

8.2 Funeral drive-times

8.3 The distance considered reasonable for people to travel in a funeral cortège to a crematorium has been considered at a number of planning appeals and also at a Competition Tribunal Appeal.

8.4 The Competition Appeal Tribunal Case No. 1044/2/1/04 Judgment of 6th July 2005 includes reference to the importance of travel times by car in relation to crematoria[3]:

8.5 *199. … Mourners at a funeral, many of whom are likely to be elderly, would not normally wish to travel long distances if that could be avoided; many elderly mourners may not have transport available to take them longer distances; extra travel is likely to increase the time needed, and also to add to the cost of the funeral in terms of fuel and labour costs; and there may be sentimental reasons for choosing the local crematorium, for example to facilitate subsequent visits to view a memorial tablet, to visit a garden of remembrance, or because a previous family member was cremated there…*

207. In addition, there has been no challenge to the evidence, which emerges from the planning decision of 17 February 1999 relating to South Crofty plc in Cornwall, in which the planning inspector said:

"as a rule of thumb, the industry works on the basis that a funeral party should not have to undergo more than 30 minutes' drive to a crematorium."

[3] Office of Fair Trading v W. Austin & Sons & Ors [2005] CAT 25 (6 July 2005)

8.6 In the Camborne Appeal Decision[4], the Inspector Mike Robins overturned a decision by the Local Planning Authority to refuse planning consent for a new crematorium at Treswithan, Camborne, Cornwall and he stated:

8.7 *29. In previous crematorium cases an industry standard, of 'rule of thumb', has been applied at 30 minutes travel time for the funeral cortège. It has not been rigidly applied in all cases and in this area, with its dispersed, low density population, I consider it need not be definitive of the populations served by the facility. Nonetheless, it provides a starting point for the assessment of the quality of service provided to the bereaved.*

8.8 In the Swanwick Appeal decision[5], the Inspector Harold Stephens stated:

8.9 *24. Plainly the evidence shows there is a large gap in provision where currently there is no facility within 30 minutes drivetime. The appeal proposal would fill that gap. In coming to this view I agree that the Appellant has correctly applied a factor of 0.6 to normal road traffic speeds to take account of cortège speeds.*

8.10 In the Lach Dennis Appeal Decision[6], the Inspector Richard Clegg stated:

8.11 *41. Drawing on an appeal decision concerning a crematorium in Cornwall, the QNA (Quantitative Needs Assessment) refers to an industry guideline of a 30-minutes drive-time from a crematorium at cortège speed: this basis for a catchment area is also referred to in the appraisal of the proposal commissioned by the Council (Analysis of Application by Memoria Ltd – AAM). Whilst the Action Group argued that the crematoria in the surrounding area serve local needs, the appropriateness of the 30-minutes drive-time was not disputed in the representations, and I consider that it provides a useful factor to apply in assessing need.*

[4] Appeal Ref. APP/D0840/A/09/2098108 Land at Race Farm, Puggis Hill, Treswithian, Camborne, Cornwall
[5] Appeal Ref: APP/M1005/A/12/2188880 Land east of Derby Road, Swanwick, Derbyshire
[6] APP/A0665/A/12/2186911, Land south-west of Birches Lane, Lach Dennis Cheshire

8.12 In the Halstead Appeal Decision[7], the Inspector David Richards stated:

8.13 *20. With regard to qualitative measures of need, evidence commissioned by the Appellant shows that some 130,000 - 140,000 people who currently live more than 30-minutes drive-time from a crematorium (at speeds appropriate to a funeral cortege) would be within 30 minutes of the appeal site.*

8.14 In the Great Glen Appeal Decision[8], the Inspector Paul Crysell stated:

8.15 *8. A substantial population (350,000) lives within 30 minutes' drive time of Great Glen of which 160,000 would be closer to the proposed site than to an existing crematorium. Demographic changes indicate the catchment population will rise to 190,000 by 2031 increasing the demand for cremations from 1,051 to 1,234 per annum. Consequently, while there is strong opposition to the proposed scheme it is apparent that many respondents accept additional facilities are required. I agree because the evidence supports the provision of new facilities in this part of the County.*

8.16 In the Northop Appeal Decision[9], the Inspector Vicki Hurst stated:

8.17 *13. The appellant has carried out an alternative sites assessment focussing on previously developed land or that within an existing built up area within the defined catchment area based on the recognised 30 minute drive time.*

19. In terms of the site's sustainability credentials, the appeal site lies within a central location to the catchment area that it would serve. It would be closer than any other crematorium to over 140,000 people and would enable approximately 80,000 people to travel to the crematorium within 30 minutes. This would result in a significant mileage saving and associated reduction in CO2 emissions and would be beneficial to local well-being.

[7] Appeal Ref: APP/G2245/A/13/2210128 Land south of Orchard Barn, London Road, Halstead, TN14 7AD
[8] Appeal Ref: APP/F2415/A/14/2211858 Land at London Road, Great Glen, Leicestershire LE8 9DJ
[9] Appeal Ref: APP/A6835/A/15/3005992 Land at Kelsterton Lane, Connah's Quay CH7 6DW

8.18 In the Leeds Appeal Decision[10], the Inspector David Cross stated:

8.19 *22. With regards to cortege travel times to crematoria, the appellants have referred to an ideal upper limit of 30 minutes, whilst the Council has indicated that longer travel times may be appropriate, such as 45 minutes. Whilst there may not be an industry standard on travel times, the appellants have provided survey evidence which indicates that the majority of people consider that a journey over 30 minutes would be excessive. I have no reason to doubt the robustness of this survey and on that basis I consider that an ideal travel time of up to 30 minutes is an appropriate rule of thumb, particularly for urban areas where journey times to facilities are generally shorter*.

24. However, whilst the distribution of that catchment population includes urban areas, a significant extent of the area includes areas to the north east of Leeds which is characterised by freestanding small towns and villages located in a rural setting, where longer journeys to facilities may be more typical. Within that context, I am not persuaded that the 30-minute drivetime should be seen as a definitive limit as, due to the nature of this area, longer drivetimes may be more acceptable to residents.

8.20 Whilst neither enshrined in statute nor planning policy, it is clear that a 30-minute funeral drive-time at 60% of normal traffic speeds, with a clear recognition that this may be extended in rural areas, has been held at Appeal to be an appropriate basis upon which to establish the quantitative need for a new crematorium.

8.21 Funeral drive-time catchment mapping

8.22 Where a Funeral Director's hearse and limousine(s) lead a cortège of mourners' vehicles to a crematorium, travel speeds are often much lower than for normal traffic. This is mainly a consequence of drivers trying to keep the cortège together when negotiating junctions so that everybody finds their way to the crematorium and arrives together at the right time for the funeral service.

[10] Appeal Decision APP/N4720/W/19/3233784 Land at Garforth Golf Range, Long Lane, Garforth, Leeds LS25 2DS

8.23 Even where there is no cortège following, a hearse conveying a coffin to a crematorium will drive at a similar reduced speed as a matter of respect and tradition.

8.24 Sophisticated computer software enables the identification of funeral travel times by road traffic and its graphical representation as isochrones, based upon population within each Lower Super Output Area (LSOA).

8.25 For this report, transport planning specialists used ESRI ArcGIS 10.4 and HERE software, together with associated ONS data relating to population and deaths in 2018 by LSOA, to produce isochrones within three different drive-time catchments: 15-minutes; 30-minutes; and 45-minutes, all at 60% of normal traffic speeds. These three distinct drive-times give a more comprehensive picture of the crematoria catchments than any single drive-time and better reflect the very varied population density of the area. For example, the two relatively large LSOAs lying between Turners Hill and the M23 have on average only 160 people per km^2, compared with the relatively small LSOAs on the Crawley side of the M23, which have on average 4,981 people per km^2.

8.26 The map extract below in Figure 13 illustrates population density by LSOA in 2018.

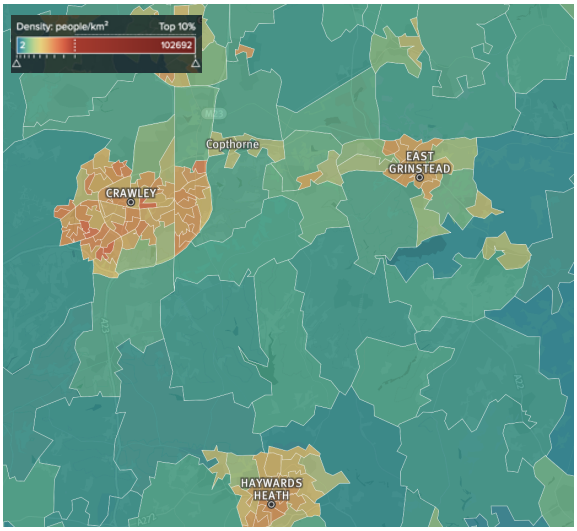


Figure 13: Population in 2018 by LSOA

8.27 The drive-time catchment mapping and associated data on catchment populations and deaths are presented below in two different scenarios:

- **Scenario 1 - Existing provision**: existing crematoria
- **Scenario 2 - Proposed provision**: existing crematoria, ***plus*** the proposed Turners Hill Crematorium.

8.28 Existing provision – scenario 1

8.29 There are five existing crematoria, which are most likely to be used by residents of the area under consideration. One of them, Wealden Crematorium at Horam, opened in May 2019 and data on its annual cremations is thus not yet available. These five crematoria form a 'ring' of crematoria around the proposed new Turners Hill Crematorium. When a death occurs within the catchment area of the proposed new crematorium, bereaved families living locally are very unlikely to make a long journey past either the proposed or the existing crematoria in order to reach more distant crematoria.

8.30 It is important to note that the catchment areas of the five selected crematoria are, in turn, constrained by the catchments of 13 other crematoria outside of the immediate search area. These are Beckenham, Charing, Chichester, Croydon, Eastbourne, Eltham, Gravesend, Guildford, Hastings, Leatherhead, Maidstone, Medway and Woking. The catchments of these other crematoria have all been taken into account in the production of the figures below showing catchments, populations and deaths. The isochrones and associated data thus all relate to the constrained catchments of the four key crematoria.

8.31 The images below in Figures 14, 15 and 16 illustrate the 15, 30 and 45-minute drive-time isochrones at 60% of normal traffic speeds around the existing crematoria serving the wider area around the proposed Turners Hill Crematorium. The location of the proposed Turners Hill Crematorium is also illustrated thus: ●

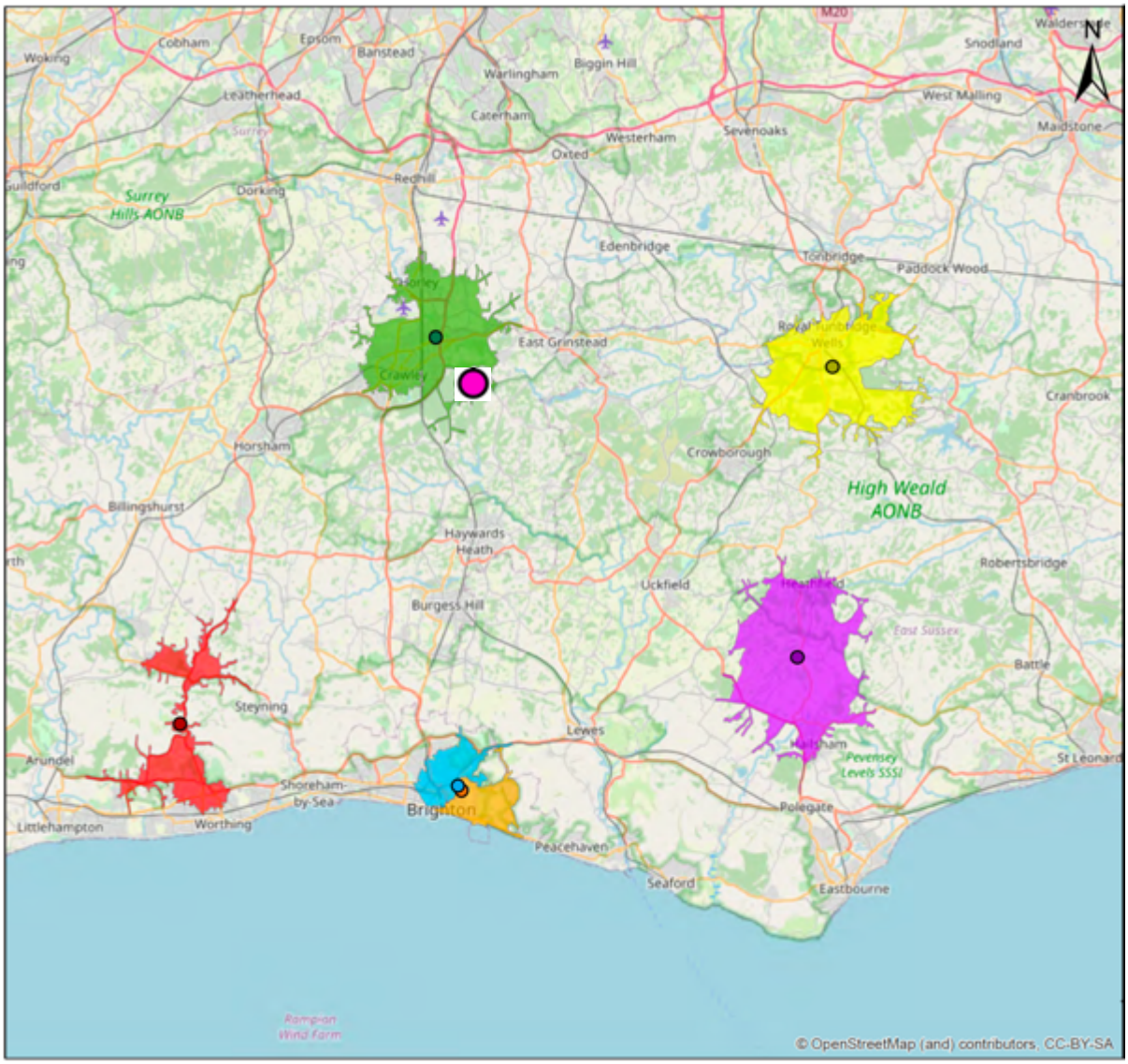


*Figure 14: **15**-minute drive-time catchments of existing crematoria*

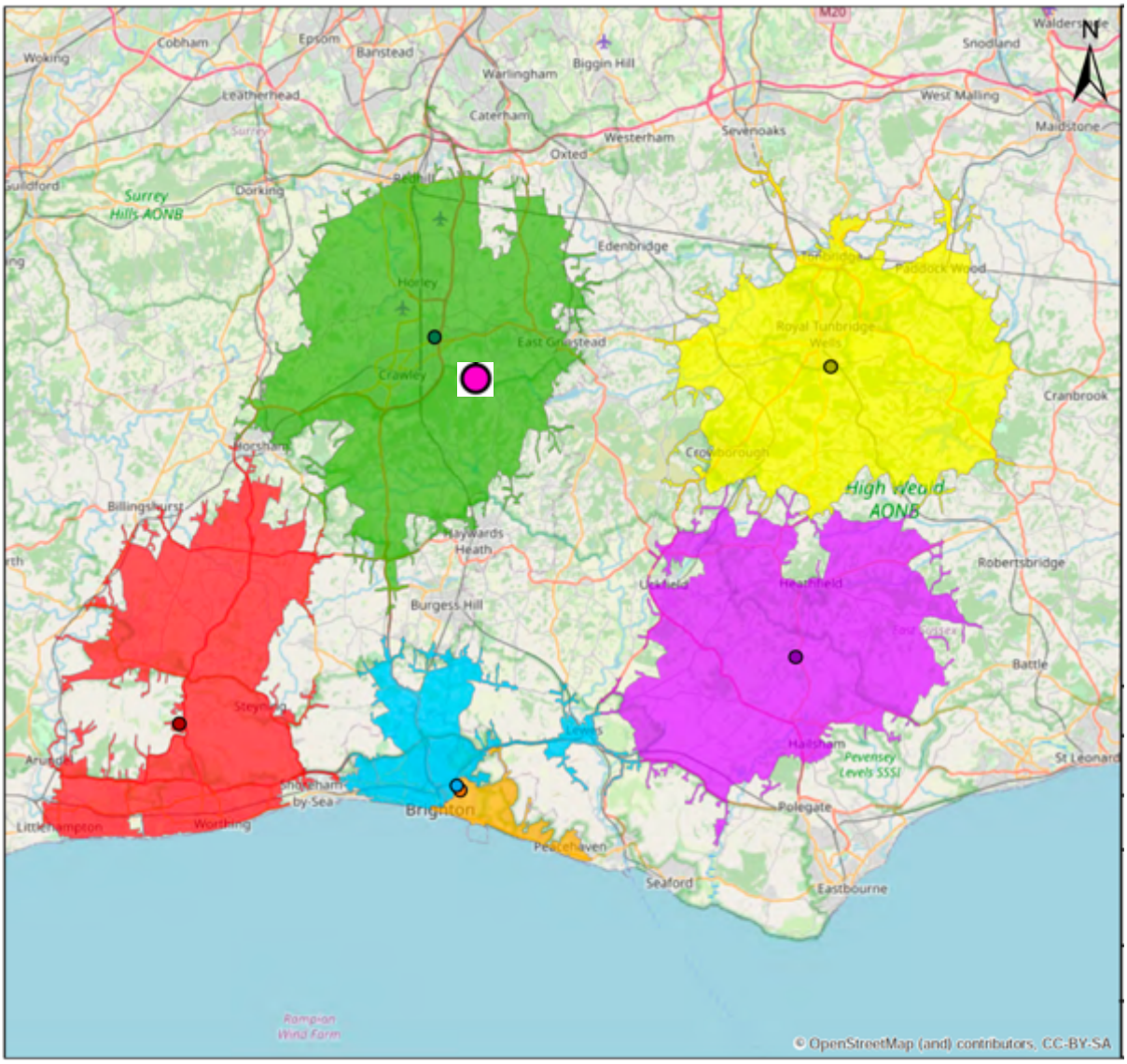


*Figure 15: **30**-minute drive-time catchments of existing crematoria*

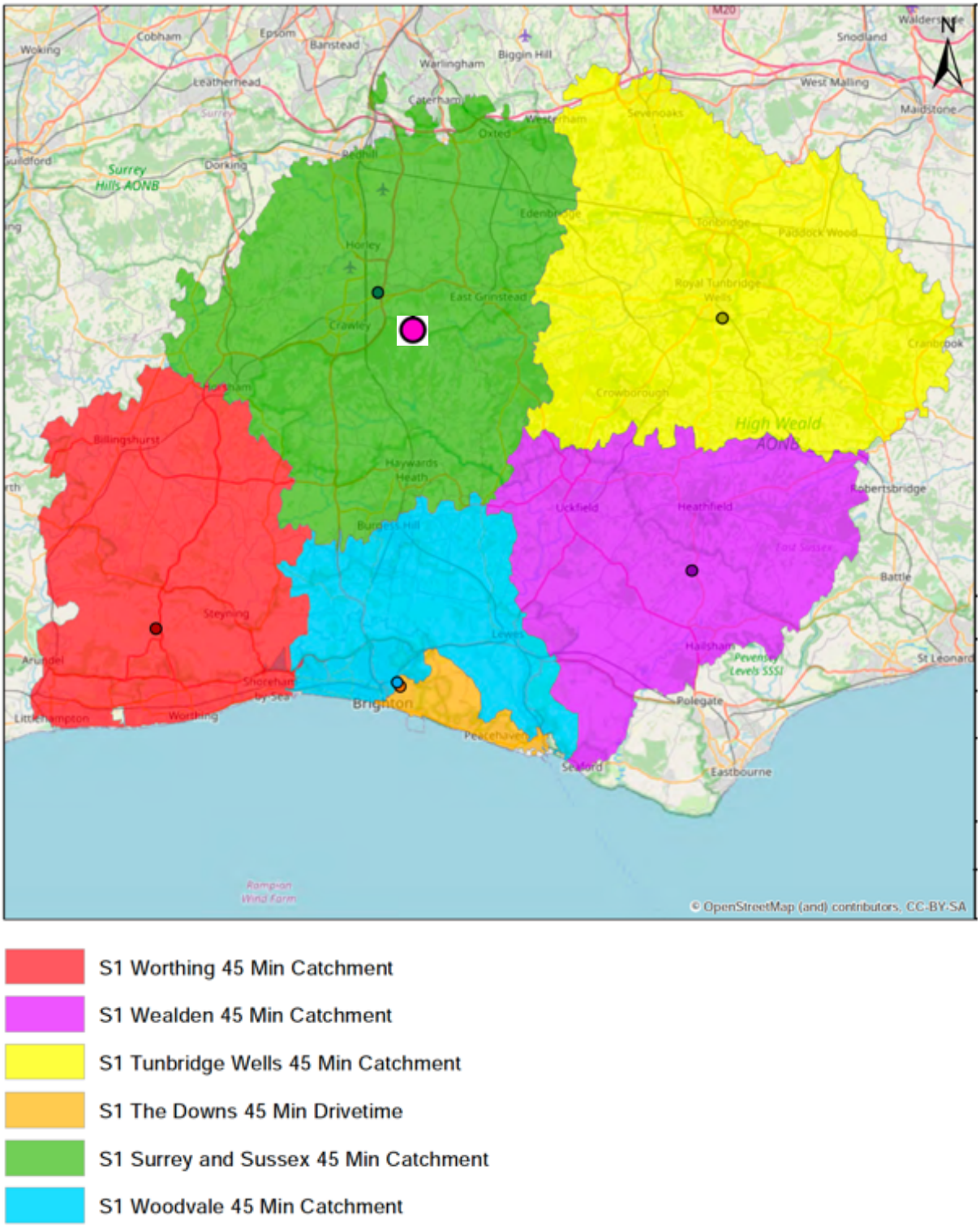
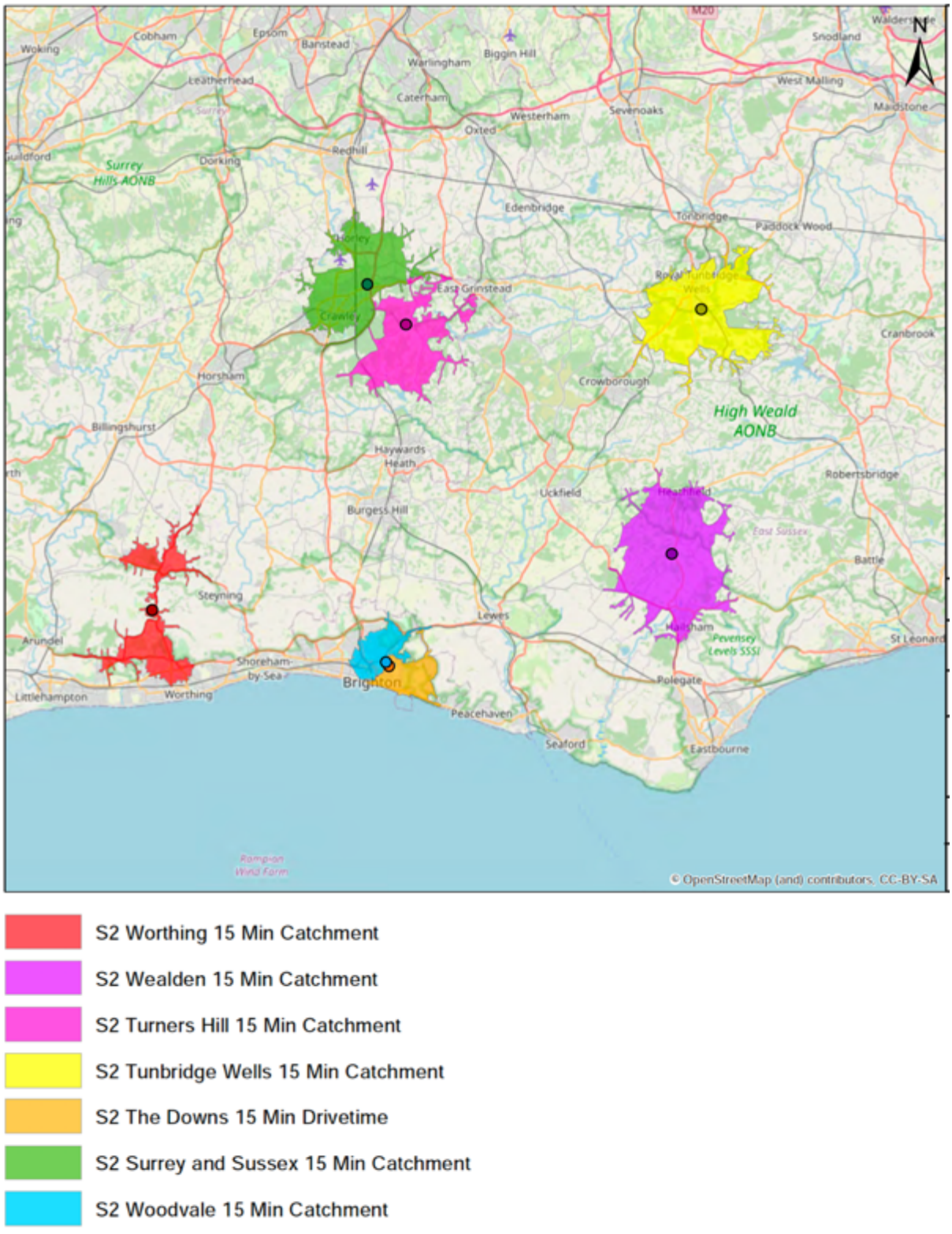


*Figure 16: **45**-minute drive-time catchments of existing crematoria*

8.32 Proposed provision - scenario 2

8.33 The images below in Figures 17, 18 and 19 illustrate the 15, 30 and 45-minute drive-time isochrones at 60% of normal traffic speeds around the existing crematoria, together with those for the proposed new Turners Hill Crematorium. When a death occurs within the catchment area of the proposed new crematorium, bereaved families living locally are very unlikely to make a long journey past either the proposed or the existing crematoria in order to reach more distant crematoria.



S2 Worthing 15 Min Catchment

S2 Wealden 15 Min Catchment

S2 Turners Hill 15 Min Catchment

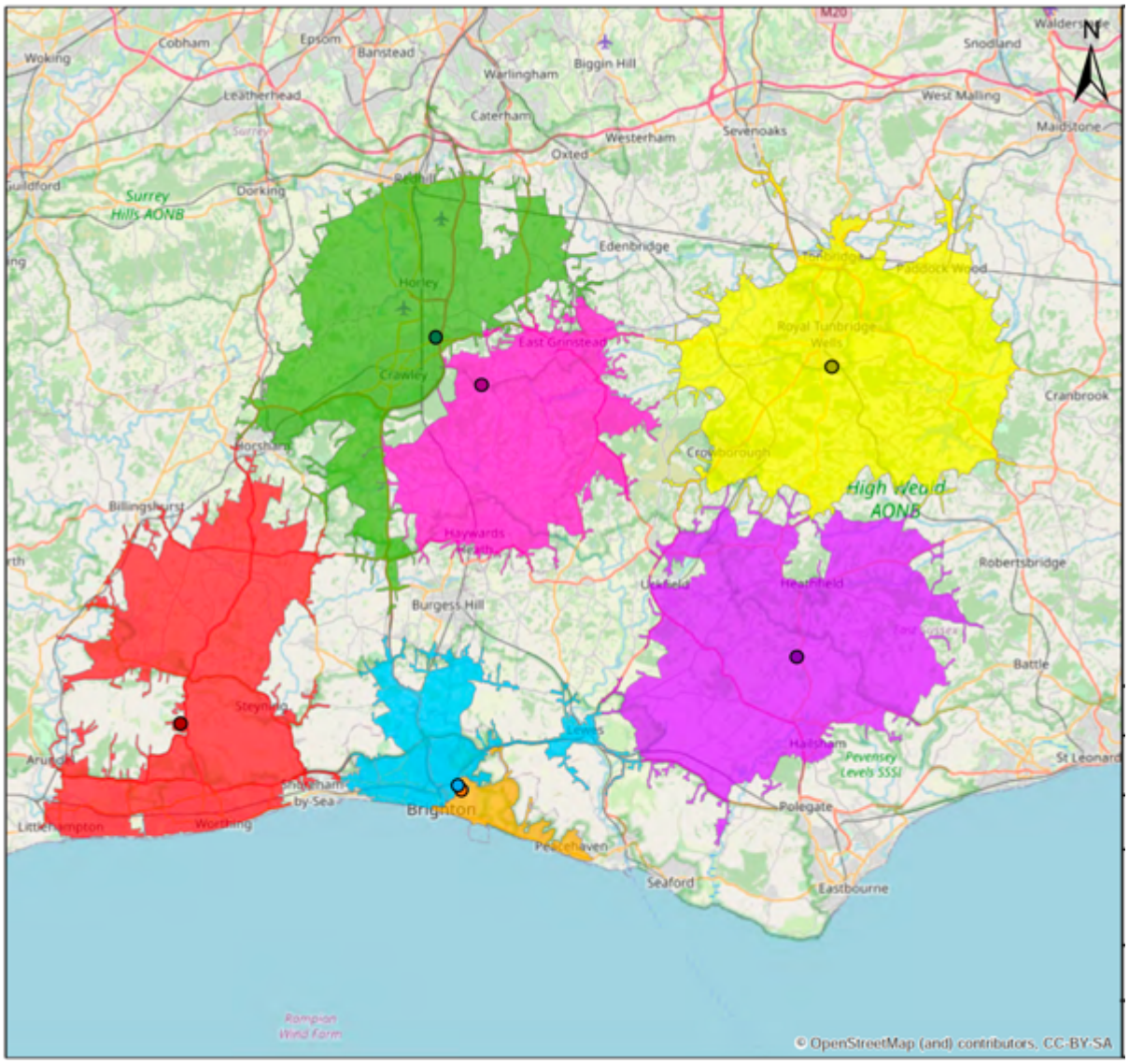
S2 Tunbridge Wells 15 Min Catchment

S2 The Downs 15 Min Drivetime

S2 Surrey and Sussex 15 Min Catchment

S2 Woodvale 15 Min Catchment

*Figure 17: **15**-minute drive-time catchments of existing crematoria, plus proposed Turners Hill Crematorium*



S2 Worthing 30 Min Catchment

S2 Wealden 30 Min Catchment

S2 Turners Hill 30 Min Catchment

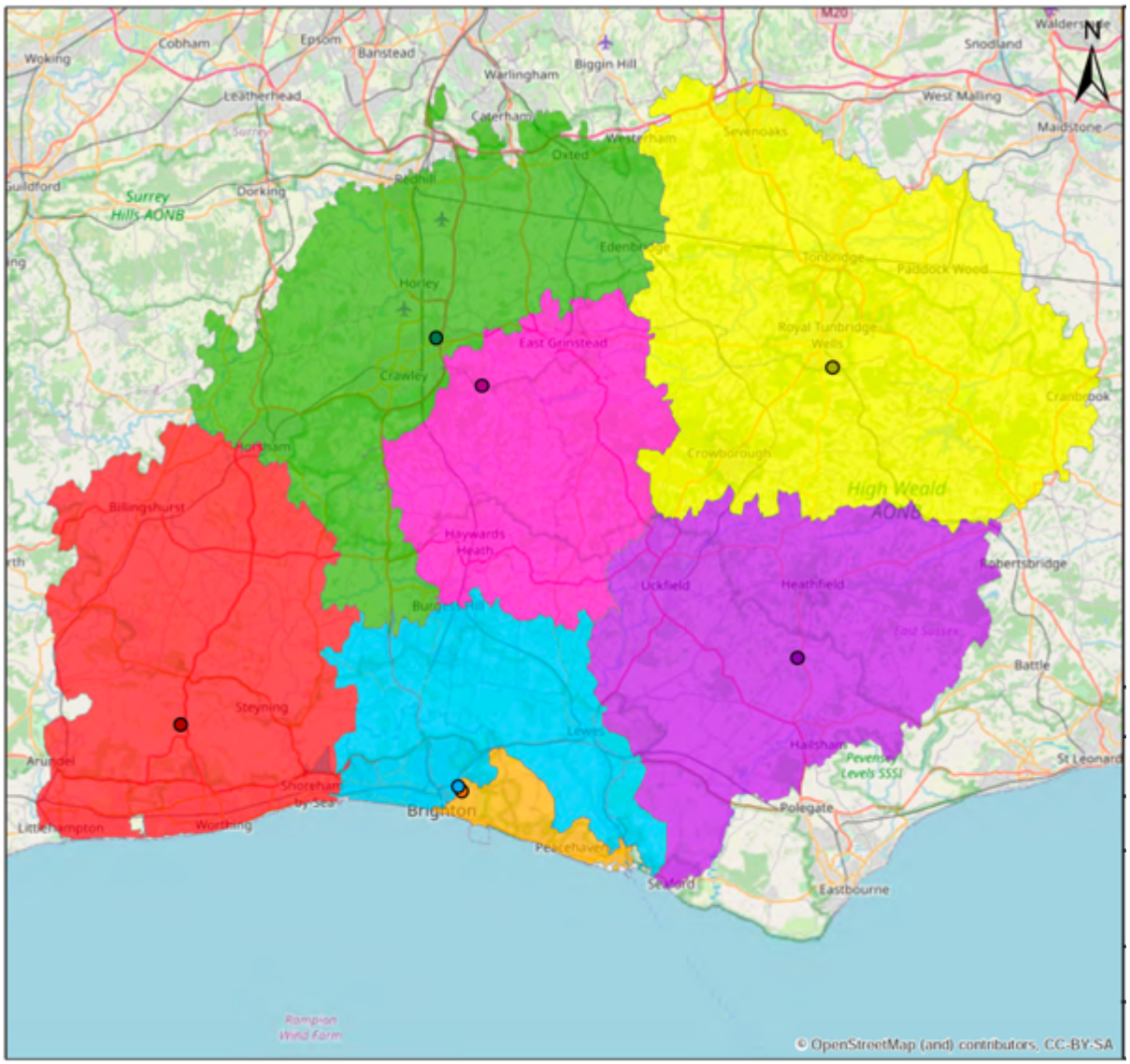
S2 Tunbridge Wells 30 Min Catchment

S2 The Downs 30 Min Drivetime

S2 Surrey and Sussex 30 Min Catchment

S2 Woodvale 30 Min Catchment

*Figure 18: **30**-minute drive-time catchments of existing crematoria, plus proposed Turners Hill Crematorium*



S2 Worthing 45 Min Catchment

S2 Wealden 45 Min Catchment

S2 Turners Hill 45 Min Catchment

S2 Tunbridge Wells 45 Min Catchment

S2 The Downs 45 Min Drivetime

S2 Surrey and Sussex 45 Min Catchment

S2 Woodvale 45 Min Catchment

*Figure 19: **45**-minute drive-time catchments of existing crematoria, plus proposed Turners Hill Crematorium*

8.34 The tables below at Figures 20, 21 and 22 illustrate the drive-time catchment populations and numbers of deaths in 2018 for both the current and the proposed provision of crematoria, together with the variation between existing and proposed.

Crematorium	Population			Deaths		
	15 Mins	30 Mins	45 Mins	15 Mins	30 Mins	45 Mins
Brighton The Downs	56,692	80,053	103,468	566	912	1,101
Brighton Woodvale	96,967	236,349	297,551	785	2,326	2,855
Surrey & Sussex Crematorium	113,548	281,988	423,773	880	2,123	3,297
Tunbridge Wells	61,495	163,417	251,769	552	1,378	2,185
Wealden	25,519	68,840	109,419	249	641	1,093
Worthing	42,481	250,172	308,400	545	3,115	3,665
Totals	**396,702**	**1,080,819**	**1,494,380**	**3,577**	**10,495**	**14,196**

*Figure 20: Population and deaths within drive-time catchments of **existing** crematoria provision*

Crematorium	Population			Deaths		
	15 Mins	30 Mins	45 Mins	15 Mins	30 Mins	45 Mins
Brighton The Downs	56,692	80,053	103,468	566	912	1,101
Brighton Woodvale	96,967	236,349	292,441	785	2,326	2,809
Surrey & Sussex Crematorium	111,801	237,215	316,426	868	1,748	2,399
Tunbridge Wells	61,495	163,417	245,814	552	1,378	2,075
Turners Hill Crematorium	11,755	88,305	122,916	104	807	1,097
Wealden	25,519	68,840	104,915	249	641	1,050
Worthing	42,481	250,172	308,400	545	3,115	3,665
Totals	**406,710**	**1,124,351**	**1,494,380**	**3,669**	**10,927**	**14,196**

*Figure 21: Population and deaths within drive-time catchments of **proposed** crematoria provision*

Crematorium	Population			Deaths		
	15 Mins	30 Mins	45 Mins	15 Mins	30 Mins	45 Mins
Brighton The Downs						
Brighton Woodvale			(5,110)			(46)
Surrey & Sussex Crematorium	(1,747)	(44,773)	(107,347)	(12)	(375)	(898)
Tunbridge Wells			(5,955)			(110)
Turners Hill Crematorium	11,755	88,305	122,916	104	807	1,097
Wealden			(4,504)			(43)
Worthing						
Totals	**10,008**	**43,532**	**0**	**92**	**432**	**0**

*Figure 22: **Variation** in population and deaths between **existing and proposed** crematoria provision*

8.35 For the proposed new Turners Hill Crematorium, Figures 21 and 22 illustrate that:

- **11,755** people live within 15 minutes' drive-time, including
- **10,008** living within 15 minutes' drive-time of a crematorium for the first time
- **88,305** people live within 30 minutes' drive-time, including
- **43,532** living within 30 minutes' drive-time of a crematorium for the first time
- **122,916** people live within 45 minutes' drive-time

8.36 Within each drive-time catchment in 2018, all of these people would have lived closer to the Turners Hill Crematorium than to any other crematorium.

8.37 The areas of residence and numbers of the population that will benefit through proximity to the new crematorium are identified in the table below at Figure 23.

Local Authority	15 Mins		30 Mins		45 Mins	
	Population	Deaths	Population	Deaths	Population	Deaths
Tandridge			1,956	19	1,956	19
Wealden			6,381	107	11,101	146
Mid Sussex	11,755	104	79,968	681	102,935	877
Lewes					6,924	55
Total	**11,755**	**104**	**88,305**	**807**	**122,916**	**1,097**

Figure 23: Local authority populations served by proposed Turners Hill Crematorium

8.38 Figure 24 below illustrates the proportions of the total population of each local authority area that will benefit through proximity to the new crematorium:

Local Authority	Population 2018			
	Total	15 Mins	30 Mins	45 Mins
Tandridge	87,496	0.0%	2.2%	2.2%
Wealden	152,642	0.0%	4.2%	7.3%
Mid Sussex	149,716	7.9%	53.4%	68.8%
Lewes	102,744	0.0%	0.0%	6.7%
Totals	**492,598**	**2.4%**	**17.9%**	**25.0%**

Figure 24: Local authority populations served by proposed Turners Hill Crematorium

8.39 It is clear from Figures 23 and 24 that the proposed new Turners Hill Crematorium would primarily benefit the residents living in Mid Sussex District Council's area.

8.40 It is also clear from Figure 22 that, in terms of its impact upon existing crematoria, the greatest impact of the proposed new Turners Hill Crematorium would be upon Surrey and Sussex Crematorium. There would be no impact upon Worthing and little impact upon the crematoria in Brighton and the Wealden Crematorium, as these crematoria are relatively distant from the proposed new Turners Hill Crematorium.

8.41 The isochrones and associated data on population and deaths are valuable tools in understanding crematoria catchments. It is entirely logical that people will generally choose their nearest crematorium. However, in a situation such as Brighton, where Woodvale and The Downs crematoria are located in very close proximity, the difference in travel times is often only slight. Whilst the drive-time software logically allocates people to their closest crematorium, where the difference in journey time is only a matter of a few minutes, family preference rather than journey time is the key factor. For example, a family may have had a positive experience in the past of a funeral at Woodvale, see no reason to choose The Downs, with which they may not be familiar, and so select Woodvale again and vice versa.

9. Quantitative need for Turners Hill Crematorium: factors affecting capacity

9.1 Technical capacity

9.2 The theoretical maximum number of funerals that each crematorium can accommodate is readily calculated by multiplying the number of funeral slots available per day by 252 working days per year, i.e. Mondays to Fridays, excluding public holidays. This is the '**technical capacity**' of a crematorium.

9.3 In the Swanwick Appeal decision[11], the Inspector Harold Stephens stated:

9.4 *23. A number of objectors have questioned the Appellant's evidence of need, referring to the statements by existing operators of crematoria at Tunbridge Wells, Medway and Eltham that they are currently operating below capacity. While it may be that over a period of a year, there are untaken slots which are theoretically available, this doesn't take account of seasonal fluctuations in mortality which affect levels of demand.*

30 The consensus amongst funeral directors was that unacceptable delays of 2 or 3 weeks are encountered during the winter months. The employees or operators of the existing crematoria disagree. However, those employees or operators have a vested interest in painting a rosy picture of their own operations.

31. The four existing crematoria have technical capacity when looking at their operation over any particular year, but the fact that Chesterfield crematorium, for example, has plenty of availability in the summer months, or at 16:30 hours on a winter's afternoon is of little comfort or use to those needing to book a funeral at the busiest time of the year at a time of day that would actually allow friends and family to attend. The technical capacity of the four crematoria does not bring people who currently live beyond a reasonable distance to a crematorium any closer to that crematorium. Plainly, there is a quantitative and qualitative need in this case.

[11] Appeal Ref: APP/M1005/A/12/2188880 Land east of Derby Road, Swanwick, Derbyshire.

32. While the operators of existing facilities have stated that they are operating below capacity, I consider there is convincing evidence of seasonal variations which can give rise to waiting times of 2 – 3 weeks. In my judgment the provision of a crematorium facility in this location would be a considerable benefit to the wider population served by the new facility.

9.5 Operators of existing crematoria, whether local authority or private companies (such Dignity, which operates both Surrey and Sussex and The Downs), do not welcome the potential loss of funerals and resultant income at their crematoria that may result from the development of a new crematorium in the area. Under such circumstances, unused technical capacity may be highlighted to suggest that there is no need for a new crematorium.

9.6 In the Crooklands Appeal[12], the Inspector M Seaton stated:

9.7 *11. I am mindful that the quantitative need for a crematorium has been disputed by interested parties on the basis that there is capacity at existing crematoria. A report submitted by an interested party challenges the premise that existing facilities in Lancaster and Barrow-in-Furness are working to capacity, on the basis of a reported conversation from February 2015 with the manager of the Lancaster & Morecombe Crematorium. However, I am mindful that it has generally been held in other appeal decisions that a crematorium operating at 100% capacity is a nominal or theoretical figure due to the technical limitations of equipment and the unpopularity of certain slots during the day. Furthermore, whilst the opening of a crematorium within South Lakeland may have an impact on the business and demand for existing crematoria further away, this must be balanced against the qualitative benefit of reducing the need to travel.*

[12] Appeal Ref: APP/M0933/W/15/3135606 Land to the N of J36 of the M6, adj. to the A65 near Crooklands

9.8 **Weekend Funerals**

9.9 Weekend funeral service times at crematoria are not the norm: they are relatively unusual and are often offered on mornings only and on a limited basis, such as subject to staff availability. The private sector, including Dignity, tend to offer weekend funeral service times at their crematoria, but local authorities less so.

9.10 *Chart 5.2 shows that private sector providers tend to have slightly longer opening hours than local authority crematoria. Local authority crematoria are also much more likely to never open at weekends. Where they do open there can often be limitations, for example, insisting that the first booking made is the 9am slot, the next booking made at 9.30 and so on, meaning there is no choice of time. In our in-depth interviews various industry figures reported that local authorities had less scope to be flexible in their opening hours because this might involve paying staff overtime payments for which there is no budget available.*

The data for operational hours are skewed by the fact that many crematoria do not have 'regular' weekend hours. Rather, they open at weekends by request, therefore it's not included in our operational hours data for example, it is possible to have a weekend service at any Dignity crematorium, which is reflected in chart 5.2 weekend opening, but because they do not have regular hours this is not reflected in the operational hours, other operators may be in a similar position.[13]

9.11 Demand for weekend funerals is low, even where readily available, as further evidenced in the Need Statement supporting a Dignity planning application:

9.12 *2.7 The crematorium will be open 09:00-17:00 Monday to Friday (i.e. 40 hours a week). Core hours, when the crematorium is expected to be predominantly used are between 10:00-16:00. This means that there is a theoretical capacity for 40 slots per week, and 30 hours during core periods. Weekend services will be available although, in the experience of Dignity, such slots are rarely used.*

[13] 'Cost, Quality, Seclusion and Time'. Report by Trajectory on UK crematoria provision. November 2018

3.29 For example, the Dignity crematoria at March opens at 9am and closes at 5pm Monday to Friday. This is an 8 hour day. Each service is one hour the maximum number of funerals that can be accommodated, which is referred to as the Theoretical Capacity of a crematoria, is 8 slots per day, and 40 slots per week. Whilst Dignity offer weekend cremations, in practice these are rarely taken up by the public.
3.30 Furthermore, in the experience of Dignity, the public tend to avoid early morning and late afternoon slots, which the company regards as non-core times.[14]

9.13 The Chilterns Crematorium, operated by a local authority Joint Committee, offers Saturday funerals. This twin-chapel crematorium is unusual in that its on-line booking diary includes historic data. An analysis of all 1,135 funeral bookings between 2nd January and 31st March 2018 inclusive, a period selected as representing one of relatively high demand, shows that only 26 (2.3%) funerals took place on a Saturday. This was a busy period, with one chapel averaging 9.2 funerals per weekday and the other 8.2 funerals. The low demand for Saturday funerals at such a busy period provides strong evidence in support of that provided by experience at Dignity's 46 crematoria.

9.14 Core or Practical Capacity

9.15 It is widely accepted and understood in the bereavement services sector that there are 'core' funeral times in the middle part of the day, that are generally preferred by bereaved people. This is certainly evident to me through my experience as a crematorium manager and my work as a consultant. Core times at crematoria lie between 10.30am and 3.30pm on weekdays.

9.16 Core service times are the ones most likely to be booked first. If a core time is not available on the day of choice, people will often select a later day to be able to hold the funeral at a time that suits their particular circumstances, including attendance by relatives outside of the immediate area.

[14] Need Statement, Land at Brandon Road Weeting, Montagu Evans on behalf of Dignity. February 2019

9.17 The number of core times available is referred to as the '**core capacity**' or '**practical capacity**' of a crematorium, in contrast to its 'technical capacity'.

9.18 As with the 30-minute drive-time at 60% of normal traffic speeds, the issue of core times at crematoria has been discussed at a number of planning appeals.

9.19 In the Camborne Appeal Decision[15], the Inspector Mike Robins stated:

9.20 *23. Penmount is identified as having a capacity for 4,000 cremations per year. Although annual numbers vary it has carried out approximately 2,500 cremations per annum, with more prior to the opening of the Bodmin Crematorium in 1898. This would suggest there is significant additional capacity to deal with future demographic changes. However, I do not consider that it is entirely realistic to suggest that every available time slot, especially those in the early mornings or late afternoon, could or would be utilised and consequently the practical capacity of the crematorium would be less than the Council's theoretical figure.*

24. However, even when considering the preferred core time periods it is apparent that approximately 75% of time slots on average across both chapels are used. This therefore suggest that there would be the potential for Penmount to take increased numbers of cremations.

27. Both parties have projected an increase in the number of cremations as a result of demographic change resulting in excess of 3,000 cremations per year at Penmount. Such figures would remain within theoretical capacity, however, they would significantly increase the use of preferred core times, resulting in pressure on service delivery and potentially delays in achieving appropriate and timely cremations, I therefore turn to qualitative matters.

[15] Appeal Ref. APP/D0840/A/09/2098108 Land at Race Farm, Puggis Hill, Treswithian, Camborne, Cornwall

9.21 In the West Grinstead Appeal decision[16], the Inspector John Woolcock stated:

9.22 *41. It is also difficult to determine the current capacities of existing crematoria. This in part is dependent upon how the facility is operated. What are considered to be core hour times or slots for services can depend upon the pricing structure, where cheaper slots are made available at times of reduced demand. Furthermore, the level of fees currently charged by operators might be influenced by many factors, and by itself does not throw much light on the supply/demand question. I find no convincing evidence on this basis of an existing capacity shortfall of any significance.*

9.23 In stating that "*what are considered to be core hour times or slots for services can depend upon the pricing structure*" the Inspector is mistaken, although this may have reflected the limited evidence before him. Actual service times may vary between crematoria, particularly where there is more than one chapel, but preference for core service times is evident across UK crematoria and does not vary with the season: they are the times most commonly booked for funeral services. Of course, some people may choose a non-core service time, perhaps influenced by a cost saving. Where crematoria are 'overtrading' and working at 80% or more of their core capacity, non-core times may be the only option unless families are prepared to face extended delays until a core time is available.

9.24 Crematoria booking diaries are not generally in the public domain and in the few examples where they are available on the crematorium's web site, they normally include only current bookings and those for the next three to four weeks. However, the reality of preferred core times is evidenced in the examples provided below.

[16] Appeal Ref: APP/Z3825/A/14/2216102 Land adjacent to The Orchard Restaurant, Cowfold Road, West Grinstead RH13 8LU

9.25 Figure 25 illustrates the preference for core times over the three year period 2014 to 2016 at Fenland Crematorium. This is a single chapel crematorium opened in 2010 and the data relating to funeral service times booked were included in Dignity's planning application 17/00969/FUL for a new crematorium near Huntingdon.

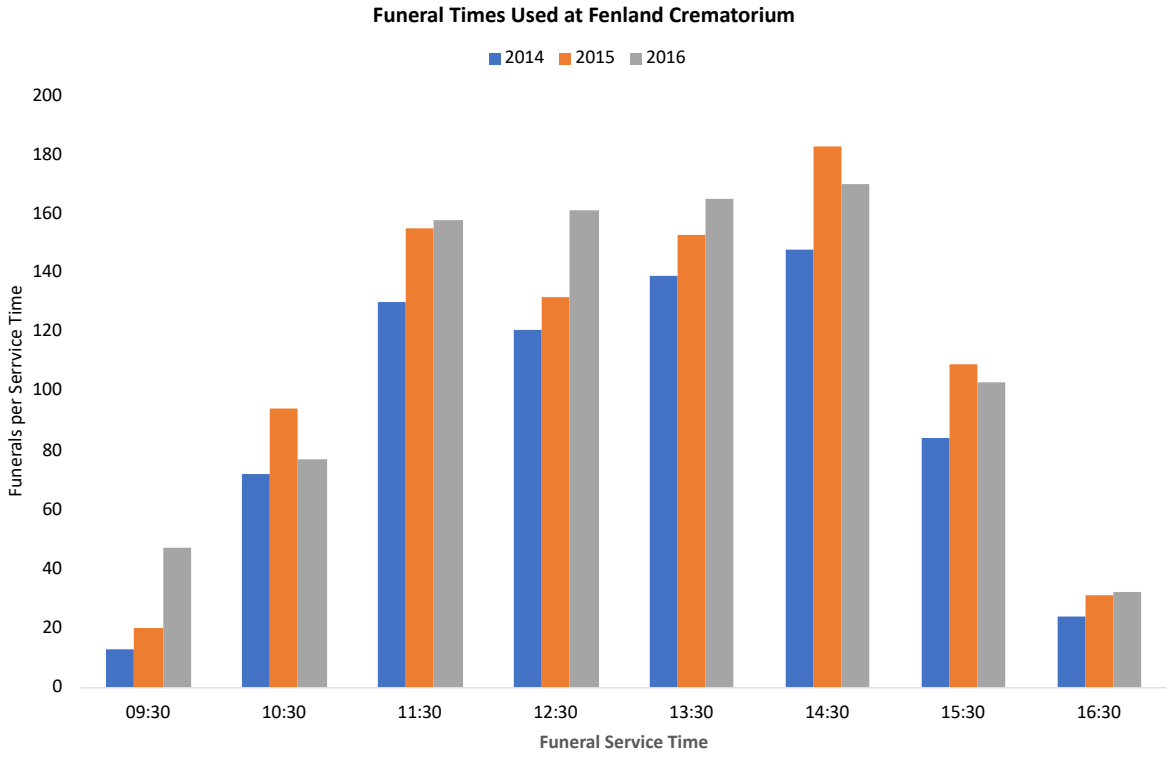


Figure 25: Funeral times used at Fenland Crematorium 2014 to 2016

9.26 Figure 26 below tabulates these 2,521 funeral service times:

Time	Number of services				Percentage of services			
	2014	2015	2016	Totals	2014	2015	2016	Totals
09:30	13	20	47	**80**	2%	2%	5%	**3%**
10:30	72	94	77	**243**	10%	11%	8%	**10%**
11:30	130	155	158	**443**	18%	18%	17%	**18%**
12:30	121	132	161	**414**	17%	15%	18%	**16%**
13:30	139	153	165	**457**	19%	17%	18%	**18%**
14:30	148	183	170	**501**	20%	21%	19%	**20%**
15:30	84	109	103	**296**	11%	12%	11%	**12%**
16:30	24	31	32	**87**	3%	4%	4%	**3%**

Figure 26 : Funeral service times booked at Fenland Crematorium 2014 to 2016

9.27 Figure 27 below similarly tabulates the funeral service times at the twin chapel Chilterns Crematorium between 2nd January and 31st March 2018 inclusive"

Hampden			Milton		
Time	**Funerals**		**Time**	**Funerals**	
08:00	1	0.2%	08:30	5	0.9%
08:45	5	0.9%	09:15	13	2.4%
09:30	32	5.5%	10:00	45	8.2%
10:15	55	9.4%	10:45	58	10.6%
11:00	61	10.4%	11:30	64	11.7%
11:45	62	10.6%	12:15	64	11.7%
12:30	64	10.9%	13:00	61	11.1%
13:15	60	10.2%	13:45	57	10.4%
14:00	63	10.8%	14:30	58	10.6%
14:45	62	10.6%	15:15	55	10.0%
15:30	60	10.2%	16:00	38	6.9%
16:15	57	9.7%	16:45	29	5.3%
17:00	3	0.5%	17:30	2	0.4%
17:45	1	0.2%			

Figure 27: Funeral services times booked at the Chilterns Crematorium January to March 2018

9.28 Figure 27 also demonstrates the minimal impact of a reduced fee for the 09:15 and 09:30 chapel times upon actual customer choice.

9.29 Figure 28 below illustrates preference for core funeral service times at Honor Oak Crematorium during 2019. Note that this crematorium allocates four 15-minute slots between 09:00 and 10:00 to undertake public health and hospital contract funerals, which normally do not have a full funeral service, and offers additional early and late slots for contracted direct cremations. These times have been omitted and the chart represents 'standard' funerals where people were free to choose the time of the funeral service.

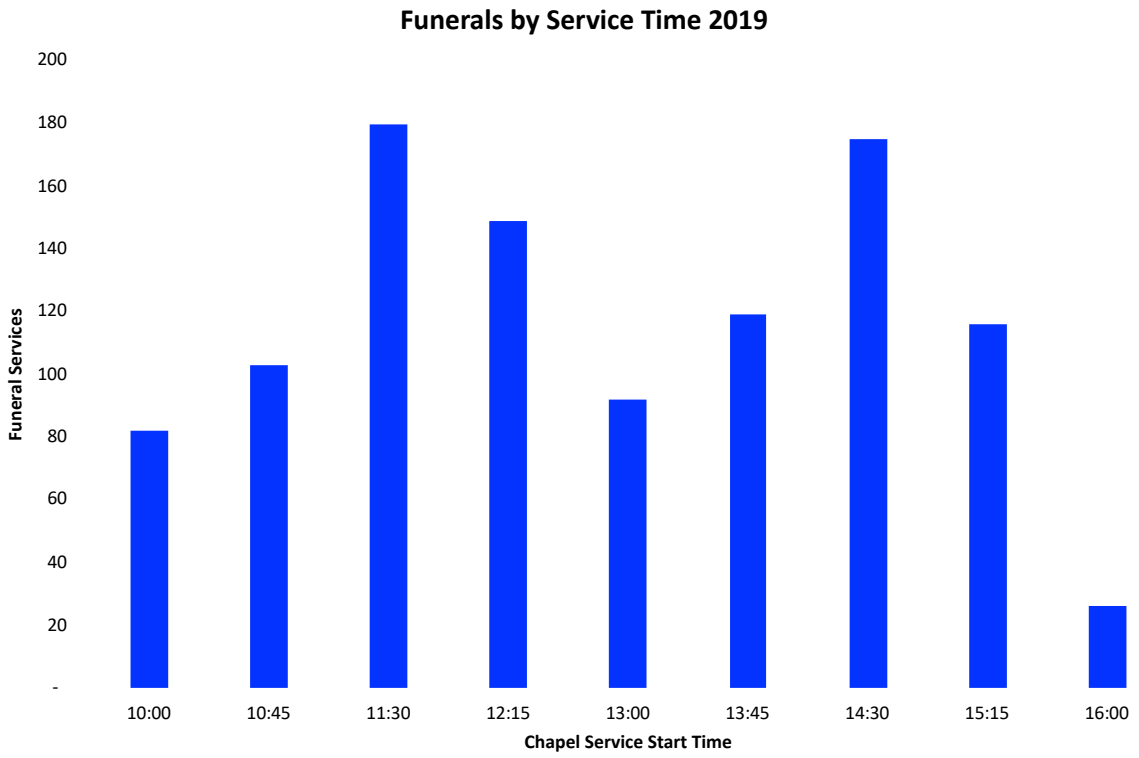


Figure 28: Funeral service times booked at Honor Oak Crematorium in 2019

9.30 Funeral service interval and funeral service duration

9.31 Crematoria may have a single chapel or two, or even three chapels. They also vary in the length of interval between services, the service duration offered and whether funeral services may take place on weekends.

9.32 The funeral service **interval** is distinct from, and longer than, the funeral service **duration**. The funeral service interval allows for the time taken by mourners to enter and leave the chapel. It also enables the crematorium staff to prepare the chapel for the next service. As a generalisation, crematoria allow five minutes for the entry of mourners and a further five minutes for their exit. Thus, a service interval of thirty minutes is only sufficient for a funeral service duration of twenty minutes.

9.33 The length of funeral service interval offered at UK crematoria is now generally longer than was commonly offered in the past, partly as a result of the guidance provided by the Institute of Cemetery and Crematorium Management (ICCM).

9.34 The ICCM's 'Charter for the Bereaved' (2014 edition) sets minimum standards and targets to achieve.

9.35 *"Charter members should increase the minimum time allocated for funeral services to 40 or 45 minutes wherever possible.*

The burial or cremation ceremony should be considered a highly individual and important occasion. Each funeral should ideally arrive and depart without seeing other funerals; neither should they be delayed by the late arrival of other funerals. To help achieve this standard, a minimum service time of 40 or 45 minutes … should be an objective.'

9.36 The Cremation Society of Great Britain undertake an annual survey of crematoria, including service interval times. The latest data is tabulated below in Figure 29 and illustrates the growth since the first survey in 2007 in the availability of longer funeral service intervals:

Year	Funeral Service Interval (minutes)									Choice of times	Unknown
	20	25	30	35	40	45	50	60	90		
2007	0.8%	0.4%	42.0%	0.8%	14.0%	30.4%	0.0%	6.8%	0.0%	0.4%	4.4%
2019	0.3%	0.0%	10.7%	0.0%	16.0%	34.3%	0.3%	30.7%	0.7%	4.7%	2.3%

Figure 29: Crematoria funeral service interval times 2007 and 2019

9.37 The table in Figure 30 below illustrates the services times commonly available at crematoria with a single chapel, reflecting different lengths of service interval offered. The core service times are highlighted in each case.

Service	Interval Between Funerals			
	30 Mins	**40 Mins**	**45 Mins**	**60 Mins**
	Funeral Start Times			
1	09:30	09:30	09:30	09:30
2	10:00	10:10	10:15	10:30
3	10:30	10:50	11:00	11:30
4	11:00	11:30	11:45	12:30
5	11:30	12:10	12:30	13:30
6	12:00	12:50	13:15	14:30
7	12:30	13:30	14:00	15:30
8	13:00	14:10	14:45	16:30
9	13:30	14:50	15:30	
10	14:00	15:30	16:15	
11	14:30	16:10		
12	15:00			
13	15:30			
14	16:00			
15	16:30			
	Per Day			
Total slots	15	11	10	8
Core slots	**11**	**8**	**7**	**6**
	Per Year			
Total slots	3,780	2,772	2,520	2,016
Core slots	2,772	2,016	1,764	1,512
Core slots	**73%**	**73%**	**70%**	**75%**

Figure 30: Technical (Total) and Practical (Core) Capacity at a single chapel crematorium

9.38 The table in Figure 31 below illustrates the services times commonly available at crematoria with two chapels, again reflecting different lengths of service interval offered and the core service times:

Service	Interval Between Funerals							
	30 Mins		40 Mins		45 Mins		60 Mins	
	Funeral Start Times							
	Chapel 1	Chapel 2	Chapel 1	Chapel 2	Chapel 1	Chapel 2	Chapel 1	Chapel 2
1	09:00	09:15	09:00	09:20	09:00	09:15	09:00	09:30
2	09:30	09:45	09:40	10:00	09:45	10:00	10:00	10:30
3	10:00	10:15	10:20	10:40	10:30	10:45	11:00	11:30
4	10:30	10:45	11:00	11:20	11:15	11:30	12:00	12:30
5	11:00	11:15	11:40	12:00	12:00	12:15	13:00	13:30
6	11:30	11:45	12:20	12:40	12:45	13:00	14:00	14:30
7	12:00	12:15	13:00	13:20	13:30	13:45	15:00	15:30
8	12:30	12:45	13:40	14:00	14:15	14:30	16:00	
9	13:00	13:15	14:20	14:40	15:00	15:15		
10	13:30	13:45	15:00	15:20	15:45	16:00		
11	14:00	14:15	15:40	16:00				
12	14:30	14:45						
13	15:00	15:15						
14	15:30	15:45						
15	16:00	16:15						
	Per Day							
Total slots	15	15	11	11	10	10	8	7
Core slots	**11**	**10**	**7**	**8**	**7**	**7**	**5**	**6**
	Per Year							
Total slots	3,780	3,780	2,772	2,772	2,520	2,520	2,016	1,764
Core slots	**2,772**	**2,520**	**1,764**	**2,016**	**1,764**	**1,764**	**1,260**	**1,512**
Total slots	7,560		5,544		5,040		3,780	
Core slots	5,292		3,780		3,528		2,772	
Core slots	**70%**		**68%**		**70%**		**73%**	

Figure 31: Technical (Total) and Practical (Core) Capacity at twin chapel crematoria

9.39 Figures 30 and 31 illustrate the link between service interval and both technical and core capacity. It is very clear that the greatest technical capacity is achieved through offering the shortest funeral service interval. However, this has direct consequences upon the qualitative experience of users of the crematorium, as discussed in the next section of this report.

9.40 Depending upon the number of chapels, numbers of services offered each day and service interval times, the 'practical capacity' or 'core capacity' of crematoria can be seen to range from only 68% to 75% of 'technical capacity'.

9.41 Some crematoria offer less services on a Friday. Some crematoria offer their crematorium chapel(s) for use for funerals associated with burials in a cemetery sharing the same site, particularly if there is no separate cemetery chapel.

9.42 Some crematoria have a gap in funeral services in the middle of each day, which has a practical benefit in overcoming the problem of services that extend beyond their allocated time. This was my experience at Wrexham Crematorium, where if funerals overran their slot during the morning, the midday gap in services enabled the first afternoon funeral to start on time.

9.43 All of these factors reduce both the 'technical' and 'core' capacity of the crematorium concerned.

9.44 Seasonal fluctuations in demand

9.45 In the Halstead Appeal Decision[17], the Inspector David Richards stated:

9.46 *23. A number of objectors have questioned the Appellant's evidence of need, referring to the statements by existing operators of crematoria at Tunbridge Wells, Medway and Eltham that they are currently operating below capacity. While it may be that over a period of a year, there are untaken slots which are theoretically available, this doesn't take account of seasonal fluctuations in mortality which affect levels of demand.*

9.47 Figure 32 below illustrates clear seasonal fluctuations in mortality by using ONS data for the average number of weekly deaths in England and Wales over the five year period 2015 to 2019:

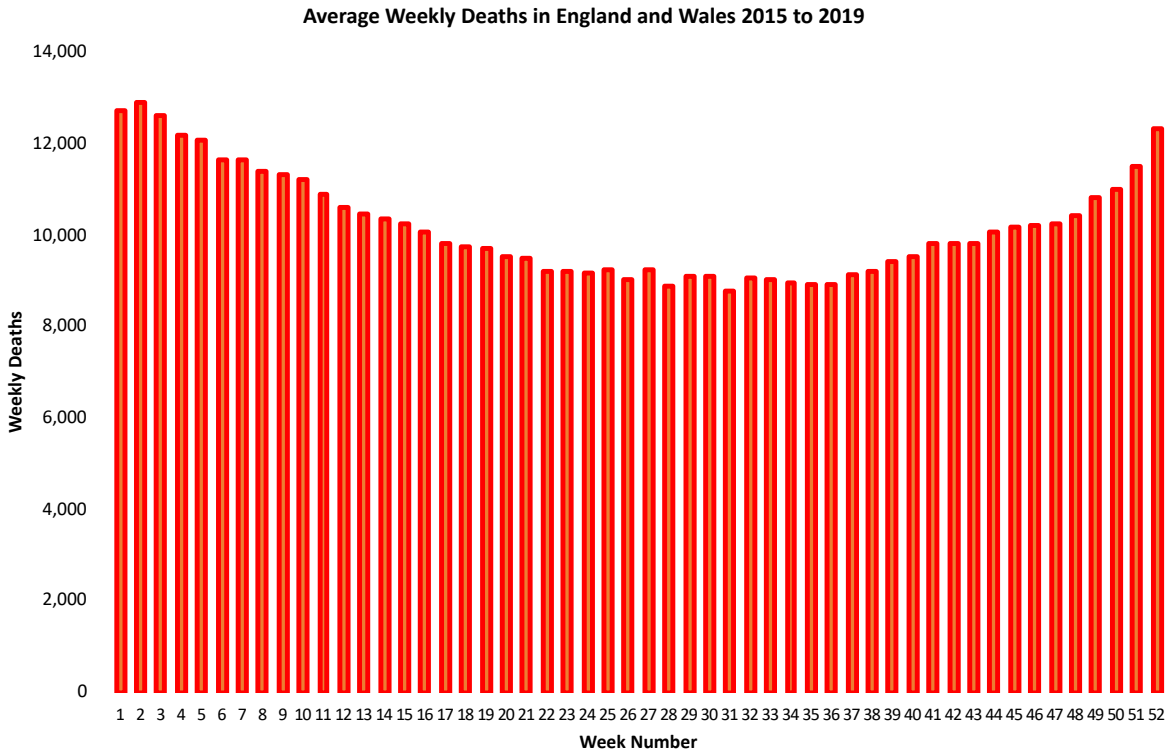


Figure 32: Average weekly deaths in England and Wales 2015 to 2019

[17] Appeal Ref: APP/G2245/A/13/2210128 Land south of Orchard Barn, London Road, Halstead, TN14 7AD

9.48 Averaging each week's data across a five year period provides a sound basis for demonstrating seasonal variation.

9.49 During the five year period 2015 to 2019, the average number of weekly deaths was 10,205. The lowest number of average weekly deaths, 8,793, occurred in week 31 (July). The highest number of average weekly deaths, 12,906, occurred in week 2 (January). Peak weekly deaths were 26% more than average. Such variation in numbers of deaths must be considered when assessing crematorium capacity.

9.50 Recovering a Planning Inquiry in South Staffordshire involving two proposed new crematoria, the Secretary of State endorsed the Inspector's views that practical capacity must be measured in the peak month of demand:

9.51 *215. All parties agree that Bushbury Crematorium in north Wolverhampton, on any assessment, is under significant pressure. The parties agree that the best measure for assessing whether a crematorium is meeting a quantitative standard is its practical capacity in a peak month. In 2015 Bushbury operated at about 115% of practical capacity in a peak month. The Council accepts that operating above 80% of practical capacity places a crematorium under pressure to offer a cremation service that meets an acceptable quantitative standard.*[18]

9.52 The context makes it clear that practical capacity is calculated using the total number of cremations, not purely those that take place at core times. In that case, there were 24% more deaths than average in the peak month.

9.53 In his report to the Secretary of State for Communities and Local Government, the Inspector at the Essington Appeal Decision, John Braithwaite also expanded upon the impact upon the qualitative experience of bereaved people due to a crematorium operating above its practical capacity during the peak month:

[18] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire

9.54 *126. It is important to note that the need is not simply demonstrated by a blackletter calculation which demonstrates that Bushbury is trading at over 80% of its practical capacity. Rather, the need is also demonstrated by the unsatisfactory (to put it mildly) qualitative situation at Bushbury, which demonstrates that qualitative issues are a manifestation of quantitative deficiencies. The existing problems at that crematorium have been a common feature of both Dignity and Westerleigh's evidence. Bushbury was developed in the 1950's to cater for a primarily Christian population. It was designed as a single chapel scheme with a second chapel being grafted on in 1970. Given that slot times are 45 minutes it is likely that there will often be four funeral parties on site at any given time. This results in a conveyor-belt experience for mourners. This is clearly deficient given the sensitivities which surround the grieving process.*

127. The lack of adequate parking at Bushbury further increases the qualitative deficiencies on site. As Mr Lathbury stated in evidence the constraints at the site means that this isn't simply an operational issue which can be dealt with.

128. Further, the overtrading has led to unacceptable delays between the date of death and date of cremation. Analysis undertaken by Dignity (and unchallenged by any party to the inquiry) shows that average waiting times between date of death and date of cremation are materially longer than either Telford or other crematoria in the area. This is a very clear qualitative deficiency which has resulted from the quantitative overtrading.[19]

9.55 The wider catchment area currently being served by existing crematoria in this part of southern England includes the following local authorities: Adur, Arun, Brighton and Hove, Chichester, Crawley, Horsham, Lewes, Mid Sussex, Reigate and Banstead, Rother, Sevenoaks, Tandridge, Tonbridge and Malling, Tunbridge Wells, Wealden and Worthing.

[19] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire

9.56 This report uses ONS data on monthly deaths by usual residence of the deceased for 2016 to 2019 inclusive, for the respective local authorities forming the catchment of each crematorium in order to inform consideration of its capacity to cope with seasonal variations in demand.

9.57 Figure 33 and 34 below illustrate the data on monthly deaths by usual residence of the deceased for 2016 to 2019 inclusive for all catchment local authorities and Figure 35 illustrates the proportion of deaths occurring in the peak month for each year.

2016																
Local Authority	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**June**	**July**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Total**	**Max**	**Min**	**Ave**
Adur	56	55	64	71	51	54	46	57	58	45	50	59	666	71	45	56
Arun	224	207	202	171	175	217	169	141	167	167	183	196	2,219	224	141	185
Brighton and Hove	191	199	202	183	162	145	153	162	158	182	197	203	2,137	203	145	178
Chichester	130	114	132	119	106	100	131	100	105	118	128	132	1,415	132	100	118
Crawley	55	65	63	61	65	65	62	66	57	62	78	60	759	78	55	63
Horsham	100	119	122	112	93	117	98	101	97	88	113	102	1,262	122	88	105
Lewes	113	96	109	98	76	100	85	74	93	84	99	94	1,121	113	74	93
Mid Sussex	133	135	111	126	77	95	89	97	106	115	132	127	1,343	135	77	112
Reigate & Banstead	120	128	136	110	110	105	92	95	110	107	120	90	1,323	136	90	110
Rother	113	116	140	115	101	95	97	86	81	101	119	107	1,271	140	81	106
Sevenoaks	89	85	83	88	90	74	83	89	64	84	89	84	1,002	90	64	84
Tandridge	78	62	71	89	66	65	56	63	60	77	60	72	819	89	56	68
Tonbridge and Malling	96	78	99	107	70	88	70	76	81	83	82	95	1,025	107	70	85
Tunbridge Wells	92	74	99	97	106	100	78	73	75	91	96	85	1,066	106	73	89
Wealden	138	139	157	161	132	141	125	126	144	150	171	145	1,729	171	125	144
Worthing	126	106	145	114	118	86	99	89	115	103	131	138	1,370	145	86	114
2017																
Local Authority	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**June**	**July**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Total**	**Max**	**Min**	**Ave**
Adur	77	58	85	57	68	58	40	56	51	56	58	81	745	85	40	62
Arun	262	186	206	147	173	171	148	161	166	194	203	176	2,193	262	147	183
Brighton and Hove	256	227	212	136	195	163	158	175	136	153	188	197	2,196	256	136	183
Chichester	170	126	135	130	120	122	100	104	104	122	119	132	1,484	170	100	124
Crawley	88	67	78	51	54	69	51	61	64	57	61	52	753	88	51	63
Horsham	168	101	132	101	109	101	89	99	119	98	122	103	1,342	168	89	112
Lewes	118	93	77	82	106	91	84	81	76	115	93	84	1,100	118	76	92
Mid Sussex	174	149	132	102	110	106	104	98	104	104	104	111	1,398	174	98	117
Reigate & Banstead	147	133	122	99	114	115	86	116	105	108	118	130	1,393	147	86	116
Rother	176	125	130	98	106	118	95	92	101	121	118	112	1,392	176	92	116
Sevenoaks	131	81	94	85	116	80	88	80	76	86	88	80	1,085	131	76	90
Tandridge	103	68	81	57	74	69	42	53	62	66	95	79	849	103	42	71
Tonbridge and Malling	116	85	94	77	87	82	69	80	58	100	95	93	1,036	116	58	86
Tunbridge Wells	97	86	85	87	105	78	82	73	82	79	80	96	1,030	105	73	86
Wealden	190	175	142	145	122	143	139	143	151	155	132	159	1,796	190	122	150
Worthing	173	152	138	84	117	104	106	113	97	127	127	122	1,460	173	84	122

Figure 33: ONS Monthly deaths by usual residence of the deceased for 2016 & 2017

2018																
Local Authority	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**June**	**July**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Total**	**Max**	**Min**	**Ave**
Adur	97	65	74	57	56	28	50	58	46	53	61	50	695	97	28	58
Arun	306	204	204	200	154	156	165	161	144	170	203	168	2,235	306	144	186
Brighton and Hove	261	215	220	178	182	148	151	164	153	171	206	182	2,231	261	148	186
Chichester	213	126	138	138	119	108	92	99	111	110	111	107	1,472	213	92	123
Crawley	97	63	80	68	65	56	50	56	64	57	58	50	764	97	50	64
Horsham	141	100	130	126	97	111	100	88	101	104	107	99	1,304	141	88	109
Lewes	134	103	112	104	100	74	88	103	76	97	77	82	1,150	134	74	96
Mid Sussex	176	113	146	131	95	93	107	96	99	103	109	114	1,382	176	93	115
Reigate & Banstead	149	132	139	120	93	88	95	102	86	98	88	95	1,285	149	86	107
Rother	151	125	128	117	108	72	101	97	102	118	114	92	1,325	151	72	110
Sevenoaks	130	101	108	102	82	86	89	90	85	100	98	73	1,144	130	73	95
Tandridge	89	77	80	65	59	39	59	71	50	72	78	69	808	89	39	67
Tonbridge and Malling	139	101	101	94	86	98	82	95	89	101	79	97	1,162	139	79	97
Tunbridge Wells	126	106	107	86	90	87	81	75	84	106	82	74	1,104	126	74	92
Wealden	201	167	191	165	164	124	140	119	130	140	137	138	1,816	201	119	151
Worthing	164	124	146	129	100	78	106	78	102	115	103	125	1,370	164	78	114
2019																
Local Authority	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**June**	**July**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Total**	**Max**	**Min**	**Ave**
Adur	70	59	57	51	56	61	68	53	55	61	55	57	703	70	51	59
Arun	240	175	182	172	186	163	178	166	153	184	192	158	2,149	240	153	179
Brighton and Hove	193	196	169	169	192	158	183	139	165	188	171	170	2,093	196	139	174
Chichester	159	115	97	112	134	108	105	107	119	148	127	136	1,467	159	97	122
Crawley	65	76	70	68	74	53	48	46	59	66	63	70	758	76	46	63
Horsham	136	123	111	97	116	99	113	88	102	127	95	104	1,311	136	88	109
Lewes	146	105	95	86	111	77	79	80	88	91	119	95	1,172	146	77	98
Mid Sussex	148	112	120	117	115	93	108	93	99	116	125	113	1,359	148	93	113
Reigate & Banstead	166	115	114	94	112	101	94	93	88	99	108	96	1,280	166	88	107
Rother	146	101	133	106	134	103	98	95	82	130	125	118	1,371	146	82	114
Sevenoaks	107	109	98	95	90	89	87	113	115	121	113	144	1,281	144	87	107
Tandridge	93	74	78	80	51	52	55	67	66	80	78	78	852	93	51	71
Tonbridge and Malling	119	99	96	90	76	69	82	85	78	95	78	95	1,062	119	69	89
Tunbridge Wells	108	104	90	89	95	79	68	81	81	83	99	97	1,074	108	68	90
Wealden	168	157	146	151	149	129	134	135	151	183	158	150	1,811	183	129	151
Worthing	120	116	117	95	111	88	122	98	106	91	119	129	1,312	129	88	109

Figure 34: ONS Monthly deaths by usual residence of the deceased for 2018 & 2019

Local Authority	**2016**	**2017**	**2018**	**2019**
Adur	10.7%	11.4%	14.0%	10.0%
Arun	10.1%	11.9%	13.7%	11.2%
Brighton and Hove	9.5%	11.7%	11.7%	9.4%
Chichester	9.3%	11.5%	14.5%	10.8%
Crawley	10.3%	11.7%	12.7%	10.0%
Horsham	9.7%	12.5%	10.8%	10.4%
Lewes	10.1%	10.7%	11.7%	12.5%
Mid Sussex	10.1%	12.4%	12.7%	10.9%
Reigate & Banstead	10.3%	10.6%	11.6%	13.0%
Rother	11.0%	12.6%	11.4%	10.6%
Sevenoaks	9.0%	12.1%	11.4%	11.2%
Tandridge	10.9%	12.1%	11.0%	10.9%
Tonbridge and Malling	10.4%	11.2%	12.0%	11.2%
Tunbridge Wells	9.9%	10.2%	11.4%	10.1%
Wealden	9.9%	10.6%	11.1%	10.1%
Worthing	10.6%	11.8%	12.0%	9.8%

Figure 35: Proportions of annual deaths occurring in peak months 2016 to 2019

9.58 Direct cremation

9.59 'Direct cremation' is a simple, low-cost funeral option whereby the deceased is brought to a crematorium and cremated without any ceremony. In the past, this was referred to as a 'no service' cremation, but there was usually no associated reduced fee. Both Funeral Director and crematorium charge lower fees for direct cremation than standard funerals.

9.60 Where available, direct cremation is usually offered by crematoria as early morning or late afternoon slots: direct cremations are not allocated standard or core slots. Direct cremations do not affect the technical capacity or the core capacity of a crematorium to hold standard cremation funeral services.

9.61 Data published by the Cremation Society of Great Britain indicates that in 2018, 3.1% of UK cremations were direct cremations and that this figure rose to 5.3% in 2019. Not all crematoria report direct cremations separately on their annual survey return.

9.62 Figure 36 below illustrates numbers, where published, and proportions of direct cremations during 2019:

Crematorium	Total cremations	Direct Cremations	
Brighton The Downs	1,214		
Brighton Woodvale	1,821	288	15.8%
Kent & Sussex	2,288	337	14.7%
Surrey & Sussex	2,930	89	3.0%
Wealden	370	100	27.0%
Worthing	3,489	1,048	30.0%

Figure 36: Direct cremations in 2019

9.63 In the next section of this report, direct cremations (where reported) are excluded from the total numbers of cremations in the calculations of core capacity. This procedure enhances the robustness of the results.

10. Quantitative need for Turners Hill Crematorium: assessing current capacity

10.1 Surrey and Sussex Crematorium

10.2 Figure 37 below illustrates the service times available at the Surrey and Sussex Crematorium:

	Monday to Friday		Saturday			
	Funeral Start Times					
	Memorial	St Richards	Memorial	St Richards	Key	
		08:15			08:15	Unattended direct cremation
		08:20			08:20	Unattended direct cremation
		08:25			08:25	Unattended direct cremation
		08:30			08:30	Unattended direct cremation
		08:35			08:35	Unattended direct cremation
		08:40			08:40	Unattended direct cremation
	09:00	09:00	09:00	09:30	09:00	Attended direct cremation
	09:30	09:45	09:45	10:15	09:30	Reduced fee
	10:15	10:30	10:30	11:00		Core slot
	11:00	11:15	11:15	11:45		
	11:45	12:00				
	12:30	12:45				
	13:15	13:30				
	14:00	14:15				
	14:45	15:00				
	15:30	15:45				
	16:15	16:30				
Per Day						
Total funeral slots	10	10	4	4		
Core funeral slots	7	7				
Per Year						
Total funeral slots	2,520	2,520	208	1,008		
Core funeral slots	1,764	1,764				
Total funeral slots	**5,040**		**1,216**			
Core funeral slots	**3,528**					
Per Month						
Total funeral slots	210	210	17	84		
Core funeral slots	147	147				
Total funeral slots	**420**		**101**			
Core funeral slots	**294**					

Figure 37: Funeral service times at the Surrey and Sussex Crematorium

10.3 The Surrey and Sussex Crematorium has two chapels, the smaller Memorial Chapel with a seating capacity for 54 mourners and the larger St Richards Chapel with seating capacity for 134 mourners. It offers early morning slots for 'direct cremations' and also potential weekend funerals, subject to staff availability. However, 'direct cremations' and weekend funerals are not core slots.

10.4 Excluding the eight direct cremation slots, this crematorium has 5,040 weekday funeral slots and 3,528 core funeral service times available per year.

10.5 Figure 38 below illustrates the levels of technical, practical and peak month practical capacity at the Surrey and Sussex Crematorium. These figures assume a 50% share of total funerals in each chapel.

Surrey & Sussex Crematorium	**Year**				**Averages**
	2016	**2017**	**2018**	**2019**	
Combined annual deaths in catchment area	11,449	11,782	11,919	11,960	11,778
Average deaths per month	954	982	993	997	981
Deaths in peak month	1,050	1,332	1,382	1,256	1,255
Percentage of annual deaths occurring in peak month	9.2%	11.3%	11.6%	10.5%	10.6%
Annual cremations, minus direct cremations	3,017	3,065	3,027	2,841	2,988
Total slots available	5,040	5,040	5,040	5,040	5,040
Level of technical capacity	**60%**	**61%**	**60%**	**56%**	**59%**
Total core slots available	3,528	3,528	3,528	3,528	3,528
Level of practical (core) capacity	**86%**	**87%**	**86%**	**81%**	**85%**
Average monthly core slots available	294	294	294	294	294
Average monthly cremations	251	255	252	237	249
Calculated peak month cremations	277	347	351	298	318
Level of practical (core) capacity in peak month	**94%**	**118%**	**119%**	**101%**	**108%**

Figure 38: Capacity levels at Surrey & Sussex Crematorium 2016 to 2019

10.6 Each chapel at Surrey and Sussex Crematorium is selected for a funeral not only due to the service time available on any given day, but also upon the size and character of each chapel and the capacity it offers for the number of mourners attending.

10.7 The sample of 50 obituaries for each of four crematoria featured in this reported indicated that at the Surrey and Sussex 68% of funerals used the smaller Memorial Chapel. This reflects the general predominance of funerals, which are attended by 50 or less mourners.

10.8 Figure 39 below illustrates the significant impact upon the level of peak month capacity if one chapel accommodates 60%, rather than 50%, of total funerals, conservative proportions compared with those noted in the obituaries.

Surrey & Sussex Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	11,449	11,782	11,919	11,960	11,778
Average deaths per month	954	982	993	997	981
Deaths in peak month	1,050	1,332	1,382	1,256	1,255
Percentage of annual deaths occurring in peak month	9.2%	11.3%	11.6%	10.5%	10.6%
Annual cremations, minus direct cremations	1,810	1,839	1,816	1,705	1,793
Total slots available	2,520	2,520	2,520	2,520	2,520
Level of technical capacity	**72%**	**73%**	**72%**	**68%**	**71%**
Total core slots available	1,764	1,764	1,764	1,764	1,764
Level of practical (core) capacity	**103%**	**104%**	**103%**	**97%**	**102%**
Average monthly core slots available	147	147	147	147	147
Average monthly cremations	151	153	151	142	149
Calculated peak month cremations	166	208	211	179	191
Level of practical (core) capacity in peak month	**113%**	**141%**	**143%**	**122%**	**130%**

Figure 39: Peak month capacity if one chapel hosts 60% of funerals

10.9 Figure 40 below illustrates the ONS 2018-based projections for deaths in the local authorities currently forming the catchment of the Surrey and Sussex Crematorium:

Local Authority	2020	2043	2020 to 2043	
Crawley	762	929	167	21.9%
Horsham	1,400	2,022	622	44.4%
Lewes	1,130	1,496	366	32.4%
Mid Sussex	1,430	1,924	494	34.5%
Mole Valley	893	1,086	193	21.6%
Reigate and Banstead	1,400	1,797	397	28.4%
Sevenoaks	1,130	1,370	240	21.2%
Tandridge	857	1,109	251	29.3%
Wealden	1,818	2,447	629	34.6%
Totals	**12,840**	**16,223**	**3,382**	**26.3%**

Figure 40: ONS 2018-based population projections for deaths

10.10 Figure 41 below applies the average projected 26.3% increase in catchment deaths to the number of cremations in 2019 at the Surrey and Sussex Crematorium to illustrate its potential capacity levels in 2043:

Surrey & Sussex Crematorium	2043
Combined annual deaths in catchment area	15,105
Average deaths per month	1,259
Deaths in peak month	1,586
Percentage of annual deaths occurring in peak month	10.5%
Annual cremations	3,588
Total slots available	5,040
Level of technical capacity	**71%**
Total core slots available	3,528
Level of practical (core) capacity	**102%**
Average monthly core slots available	294
Average monthly cremations	299
Calculated peak month cremations	377
Level of practical (core) capacity in peak month	**128%**

Figure 41: Projected capacity levels in 2043

10.11 In 2019, the core capacity level during the peak month at the Surrey and Sussex Crematorium was **101%**, if both chapels shared equal numbers of funerals. If one chapel undertook 60% of funerals, the core capacity level during the peak month was **122%**. The ONS 2018-based projections for deaths indicate that core capacity levels during the peak month will rise to **128%** by 2043, even if both chapels share equally the increased number of funerals. These figures all significantly exceed the 80% figure accepted at the Essington Appeal.[20]

[20] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire para. 215

10.12 Capacity at Woodvale Crematorium, Brighton

10.13 Woodvale Crematorium has two chapels and, most unusually, one is consecrated and has strong ecclesiastical imagery. It also offers the Extra-Mural Cemetery Chapel for cremation funeral services. However, if this option is taken, a service time in one of the crematorium chapels must also be booked to enable the coffin to be transferred from the Extra-Mural Cemetery Chapel after the service. Capacity at this crematorium is thus effectively provided by just two, rather than three chapels.

10.14 Figure 42 below illustrates the service times available at the Woodvale Crematorium:

	Monday to Friday		Saturday			
	Funeral Start Times					
	North	South	North	South	Key	
	08:30	08:30			08:30	Direct cremation
	09:00	09:30	09:00	09:30	09:00	Reduced fee
	10:00	10:30	10:00	10:30	10:00	Reduced fee
	11:00	11:30	11:00	11:30		Core slot
	12:00	12:30	12:00	12:30		
	13:00	13:30				
	14:00	14:30				
	15:00	15:30				
	16:00					
	Per Day					
Total funeral slots	8	7	4	4		
Core funeral slots	5	6				
	Per Year					
Total funeral slots	2,016	1,764	208	208		
Core funeral slots	1,260	1,512				
Total funeral slots	**3,780**		**416**			
Core funeral slots	**2,772**					

Figure 42: Funeral service times at the Woodvale Crematorium

10.15 Direct cremations are only available Mondays to Wednesdays.

10.16 Figure 43 below illustrates the levels of technical, practical and peak month practical capacity at the Woodvale Crematorium. These figures assume a 50% share of total funerals in each chapel.

Woodvale Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	6,529	6,781	6,762	6,638	6,678
Average deaths per month	544	565	564	553	556
Deaths in peak month	608	793	809	693	726
Percentage of annual deaths occurring in peak month	9.3%	11.7%	12.0%	10.4%	11.0%
Annual cremations, minus direct cremations	2,018	1,967	1,697	1,758	1,860
Total slots available	3,780	3,780	3,780	3,780	3,780
Level of technical capacity	**53%**	**52%**	**45%**	**47%**	**50%**
Total core slots available	2,772	2,772	2,772	2,772	2,772
Level of practical (core) capacity	**73%**	**71%**	**61%**	**63%**	**68%**
Average monthly core slots available	231	231	231	231	231
Average monthly cremations	168	164	141	147	155
Calculated peak month cremations	188	230	203	184	204
Level of practical (core) capacity in peak month	**81%**	**100%**	**88%**	**79%**	**87%**

Figure 43: Capacity levels at Woodvale Crematorium 2016 to 2019

10.17 Figure 44 below illustrates the significant impact upon the level of peak month capacity if one chapel accommodates 60%, rather than 50%, of total funerals, as indicated by the survey of obituaries: 30 funerals in the North and 20 in the South.

Woodvale Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	6,529	6,781	6,762	6,638	6,678
Average deaths per month	544	565	564	553	556
Deaths in peak month	608	793	809	693	726
Percentage of annual deaths occurring in peak month	9.3%	11.7%	12.0%	10.4%	11%
Annual cremations minus direct cremations	1,211	1,180	1,018	1,055	1,116
Total slots available	2,016	2,016	2,016	2,016	2,016
Level of technical capacity	**60%**	**59%**	**51%**	**52%**	**55%**
Total core slots available	1,260	1,260	1,260	1,260	1,260
Level of practical (core) capacity	**96%**	**94%**	**81%**	**84%**	**89%**
Average monthly core slots available	105	105	105	105	105
Average monthly cremations	101	98	85	88	93
Calculated peak month cremations	113	138	122	110	121
Level of practical (core) capacity in peak month	**107%**	**131%**	**116%**	**105%**	**115%**

Figure 44: Peak month capacity if the North Chapel hosts 60% of funerals

10.18 Figure 45 below illustrates the ONS 2018-based projections for deaths in the local authorities currently forming the catchment of Woodvale and The Downs crematoria:

Local Authority	2020	2043	2020 to 2043	
Mid Sussex	1,430	1,924	494	34.5%
Lewes	1,130	1,496	366	32.4%
Horsham	1,400	2,022	622	44.4%
Brighton and Hove	2,122	2,425	303	14.3%
Adur	733	865	132	18.0%
Totals	**5,385**	**6,808**	**1,423**	**26.4%**

Figure 45: ONS 2018-based population projections for deaths

10.19 Figure 46 below applies the average projected 26.4% increase in catchment deaths to the number of cremations in 2019 at the Woodvale Crematorium to illustrate its potential capacity levels in 2043. These projections conservatively assume 50% share of total funerals in each chapel and excludes direct cremations from total cremations:

Woodvale Crematorium	2043
Combined annual deaths in catchment area	8,390
Average deaths per month	699
Percentage of average deaths occurring per month	8.3%
Deaths in peak month	876
Percentage of annual deaths occurring in peak month	10.4%
Annual cremations	2,222
Total slots available	3,780
Level of technical capacity	**59%**
Total core slots available	2,772
Level of practical (core) capacity	**80%**
Average monthly core slots available	231
Average monthly cremations	185
Calculated peak month cremations	232
Level of practical (core) capacity in peak month	**100%**

Figure 46: Projected capacity levels in 2043

10.20 Capacity at The Downs Crematorium

10.21 The Downs Crematorium has two chapels. The Main Chapel seats 100 people, whilst the Family Chapel seats only 25.

10.22 Figure 47 below illustrates the service times available at The Downs Crematorium:

	Monday to Friday		Saturday	
	Funeral Start Times			
	Main	Family	Main	Family
		08:15	09:00	09:30
		08:20	10:00	10:30
		08:30	11:00	11:30
	09:00	09:30	12:00	12:30
	10:00	10:30		
	11:00	11:30		
	12:00	12:30		
	13:00	13:30		
	14:00	14:30		
	15:00	15:30		
	16:00			
Per Day				
Total funeral slots	8	7	4	4
Core funeral slots	5	6		
Per Year				
Total funeral slots	2,016	1,764	208	208
Core funeral slots	1,260	1,512		
Total funeral slots	**3,780**		**416**	
Core funeral slots	**2,772**			

Key	
08:15	Direct cremation
08:20	Direct cremation
08:30	Direct cremation
09:00	Reduced fee service
	Core slot

Figure 47: Funeral service times available at The Downs Crematorium

10.23 Figure 48 below illustrates the levels of technical, practical and peak month practical capacity at The Downs Crematorium. These figures assume a 50% share of total funerals in each chapel. There is no published data relating to the number of direct cremations at this crematorium, so the potential impact of these is omitted.

The Downs Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	6,529	6,781	6,762	6,638	6,678
Average deaths per month	544	565	564	553	556
Deaths in peak month	608	793	809	693	726
Percentage of annual deaths occurring in peak month	9.3%	11.7%	12.0%	10.4%	11.0%
Annual cremations	2,018	1,967	2,046	2,046	2,019
Total slots available	3,780	3,780	3,780	3,780	3,780
Level of technical capacity	**53%**	**52%**	**54%**	**54%**	**53%**
Total core slots available	2,772	2,772	2,772	2,772	2,772
Level of practical (core) capacity	**73%**	**71%**	**74%**	**74%**	**73%**
Average monthly core slots available	231	231	231	231	231
Average monthly cremations	168	164	171	171	168
Calculated peak month cremations	188	230	245	214	222
Level of practical (core) capacity in peak month	**81%**	**100%**	**106%**	**92%**	**95%**

Figure 48: Capacity levels at the Downs Crematorium 2016 to 2019

10.24 The survey of 50 obituaries relating to funerals at The Downs Crematorium found no references to any funerals that used the Family Chapel. The small seating capacity of this chapel makes it very suitable for funerals with small groups of mourners, but it is too small for most funerals. Figure 49 below illustrates the significant impact upon the level of peak month capacity if the Main Chapel accommodates 60%, rather than 50%, of total funerals. It is likely that the proportion is in reality much higher, due to the distinct differences between the capacity of each chapel.

The Downs Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	6,529	6,781	6,762	6,638	11,778
Average deaths per month	544	565	564	553	981
Deaths in peak month	608	793	809	693	1,255
Percentage of annual deaths occurring in peak month	9.3%	11.7%	12.0%	10.4%	10.6%
Annual cremations	1,211	1,180	1,228	1,228	1,212
Total slots available	2,016	2,016	2,016	2,016	2,016
Level of technical capacity	**60%**	**59%**	**61%**	**61%**	**60%**
Total core slots available	1,260	1,260	1,260	1,260	1,260
Level of practical (core) capacity	**96%**	**94%**	**97%**	**97%**	**96%**
Average monthly core slots available	105	105	105	105	105
Average monthly cremations	101	98	102	102	101
Calculated peak month cremations	113	138	147	128	131
Level of practical (core) capacity in peak month	**107%**	**131%**	**140%**	**122%**	**125%**

Figure 49: Peak month capacity if the Main Chapel hosts 60% of funerals

10.25 Figure 50 below applies the average projected 26.4% increase in catchment deaths (see Figure 45 above) to the number of cremations in 2019 at The Downs Crematorium to illustrate its potential capacity levels in 2043. These projections very conservatively assume a 50% share of total funerals in each chapel:

The Downs Crematorium	**2043**
Combined annual deaths in catchment area	8,390
Average deaths per month	699
Percentage of average deaths occurring per month	8.3%
Deaths in peak month	876
Percentage of annual deaths occurring in peak month	10.4%
Annual cremations	2,586
Total slots available	3,780
Level of technical capacity	**68%**
Total core slots available	2,772
Level of practical (core) capacity	**93%**
Average monthly core slots available	231
Average monthly cremations	216
Calculated peak month cremations	270
Level of practical (core) capacity in peak month	**117%**

Figure 50: Projected capacity levels in 2043

10.26 Capacity at the Kent and Sussex Crematorium

10.27 The Kent and Sussex Crematorium at Tunbridge Wells has a single chapel. However, the original cemetery chapel is also used for cremation funeral services.

10.28 Figure 51 below illustrates the service times available at the Kent and Sussex Crematorium:

	Main	Cemetery
	Funeral Start Times	
	09:00	
	09:30	
	10:00	10:00
	10:45	10:45
	11:30	11:30
	12:15	12:15
	13:00	13:00
	13:45	13:45
	14:30	14:30
	15:15	15:15
	16:00	16:00
	16:30	

Key	
	Reduced rate
	Core slot

	Per Day	
Total funeral slots	12	9
Core funeral slots	7	7
	Per Year	
Total funeral slots	3,024	2,268
Core funeral slots	1,764	1,764
Total funeral slots	**5,292**	
Core funeral slots	**3,528**	

Figure 51 : Funeral service times available at the Kent and Sussex Crematorium

10.29 Figure 52 below illustrates the levels of technical, practical and peak month practical capacity at the Kent and Sussex Crematorium. These figures assume a 50% share of total funerals in each chapel and omit the 337 direct cremations undertaken during 2019.

Kent & Sussex Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	4,822	4,947	5,226	5,228	5,056
Average deaths per month	402	412	436	436	421
Deaths in peak month	453	534	596	502	521
Percentage of annual deaths occurring in peak month	9.4%	10.8%	11.4%	9.6%	10.3%
Annual cremations, minus direct cremations	2,346	2,414	2,572	2,001	2,333
Total slots available	5,292	5,292	5,292	5,292	5,292
Level of technical capacity	**44%**	**46%**	**49%**	**38%**	**44%**
Total core slots available	3,528	3,528	3,528	3,528	3,528
Level of practical (core) capacity	**66%**	**68%**	**73%**	**57%**	**66%**
Average monthly core slots available	294	294	294	294	294
Average monthly cremations	196	201	214	167	194
Calculated peak month cremations	220	261	293	192	240
Level of practical (core) capacity in peak month	**75%**	**89%**	**100%**	**65%**	**82%**

Figure 52: Capacity levels at Kent & Sussex Crematorium 2016 to 2019

10.30 In response to my FOI request, Kent and Sussex Crematorium provided a very timely and helpful response. This included that in 2019, 387 (19%) of cremation funerals took place in the Cemetery Chapel. Figure 53 below illustrates the significant impact upon the level of peak month capacity of the main chapel in the crematorium undertaking 81%, rather than 50%, of cremation funerals during the past four years.

Kent & Sussex Crematorium	Year				Averages
	2016	2017	2018	2019	
Combined annual deaths in catchment area	4,822	4,947	5,226	5,228	5,056
Average deaths per month	402	412	436	436	421
Deaths in peak month	453	534	596	502	521
Percentage of annual deaths occurring in peak month	9.4%	10.8%	11.4%	9.6%	10.3%
Annual cremations, minus direct cremations	1,900	1,955	2,083	1,621	1,890
Total slots available	3,024	3,024	3,024	3,024	3,024
Level of technical capacity	**63%**	**65%**	**69%**	**54%**	**62%**
Total core slots available	1,764	1,764	1,764	1,764	1,764
Level of practical (core) capacity	**108%**	**111%**	**118%**	**92%**	**107%**
Average monthly core slots available	147	147	147	147	147
Average monthly cremations	158	163	174	135	165
Calculated peak month cremations	179	211	238	156	196
Level of practical (core) capacity in peak month	**121%**	**144%**	**162%**	**106%**	**133%**

Figure 53: Peak month capacity of the main crematorium chapel holds 81% of cremation funerals

10.31 Figure 54 below illustrates the ONS 2018-based projections for deaths in the local authorities currently forming the catchment of the Kent and Sussex crematorium:

Local Authority	2020	2043	2020 to 2043	
Sevenoaks	1,130	1,370	240	21.2%
Tonbridge and Malling	1,098	1,466	368	33.5%
Tunbridge Wells	1,098	1,471	373	34.0%
Wealden	1,818	2,447	629	34.6%
Totals	**5,144**	**6,754**	**1,610**	**31.3%**

Figure 54: ONS 2018-based projections for deaths

10.32 Figure 55 below applies the average projected 31.3% increase in catchment deaths to the number of cremation funerals in 2019 at the Kent and Sussex Crematorium to illustrate its potential capacity levels in 2043. Direct cremations are excluded and the 81% figure for funerals in the main crematorium during 2019 is applied:

Kent & Sussex Crematorium	**2043**
Combined annual deaths in catchment area	6,864
Average deaths per month	572
Deaths in peak month	659
Percentage of annual deaths occurring in peak month	9.6%
Annual cremations, minus direct cremations	2,128
Total slots available	3,024
Level of technical capacity	**70%**
Total core slots available	1,764
Level of practical (core) capacity	**121%**
Average monthly core slots available	147
Average monthly cremations	177
Calculated peak month cremations	252
Level of practical (core) capacity in peak month	**172%**

Figure 55: Projected capacity levels in 2043

10.33 Summary of capacity at existing crematoria

10.34 In Section 8 of this report, the drive-time catchment maps at Figures 14 to 19 and the tables at Figures 20, 21 and 22 reveal that Worthing Crematorium's catchment is constrained in the east by those of crematoria at Brighton and Crawley. Worthing Crematorium is simply too distant to be a realistic choice for people within Turners Hill Crematorium's catchment area, unless other specific factors take precedence. Its capacity is therefore not considered alongside other crematoria in this report.

10.35 Figure 56 below summarises the key findings of this section of the report examining capacity levels at existing crematoria, on the basis that each chapel shares equally the cremation funerals at each crematorium:

Factor	Averages for 2016 to 2019 inclusive			
	Surrey & Sussex	Woodvale	Downs	Kent & Sussex
Combined annual deaths in catchment area	11,778	6,678	6,678	5,056
Average deaths per month	981	556	556	421
Deaths in peak month	1,255	726	726	521
Percentage of annual deaths occurring in peak month	10.6%	11.0%	11.0%	10.3%
Annual cremations, minus direct cremations	2,988	1,860	2,019	2,333
Total slots available	5,040	3,780	3,780	5,292
Level of technical capacity	**59%**	**50%**	**53%**	**44%**
Total core slots available	3,528	2,772	2,772	3,528
Level of practical (core) capacity	**85%**	**68%**	**73%**	**66%**
Average monthly core slots available	294	231	231	294
Average monthly cremations	249	155	168	194
Calculated peak month cremations	318	204	222	240
Level of practical (core) capacity in peak month	**108%**	**87%**	**95%**	**82%**

Figure 56: Average capacity levels 2016 to 2019, assuming an equal share of funerals per chapel

10.36 This report has shown that funerals are not equally shared between the chapels available at each crematorium and Figure 57 below illustrates the impact of this upon average capacity levels at existing crematoria:

Factor	Averages for 2016 to 2019 inclusive			
	Surrey & Sussex	**Woodvale**	**Downs**	**Kent & Sussex**
Combined annual deaths in catchment area	11,778	6,678	6,678	4,998
Average deaths per month	981	556	556	421
Deaths in peak month	1,255	726	726	521
Percentage of annual deaths occurring in peak month	10.6%	11.0%	11.0%	10.3%
Annual cremations, minus direct cremations	1,793	1,116	1,212	1,890
Total slots available	2,520	2,016	2,016	3,024
Level of technical capacity	**71%**	**55%**	**60%**	**62%**
Total core slots available	1,764	1,260	1,260	1,764
Level of practical (core) capacity	**102%**	**89%**	**96%**	**107%**
Average monthly core slots available	147	105	105	147
Average monthly cremations	149	93	101	157
Calculated peak month cremations	191	121	131	196
Level of practical (core) capacity in peak month	**130%**	**115%**	**125%**	**133%**

Figure 57: Average capacity levels 2016 to 2019, reflecting unequal share of funerals per chapel

10.37 Capacity at Wealden Crematorium

10.38 A new crematorium typically takes a few years to become established in terms of attracting all of the potential funerals from within its catchment area. Wealden Crematorium opened in May 2019 and, as a result, there is insufficient historic data to assess its capacity in the same way as the other long-established crematoria.

10.39 In Section 8 of this report, the tables at Figures 20, 21 and 22 revealed the numbers of population and deaths within each drive-time of each crematorium. Using the data relating to Wealden, this section of the report now projects the core capacity in the peak month at Wealden Crematorium, as if it were already fully established. This is achieved by:

- using the figure of 1,093 deaths within its 45-minute drive-time catchment from Figure 19 and applying 80%, the approximate average cremation rate for England in 2018, to provide a realistic number of annual cremations at this crematorium: 874
- applying 27% to the 874 cremations to provide the number of direct cremations, in line with the first part-year of operation

10.40 Wealden Crematorium offers 60 minute service intervals beginning on the hour from 10.00am until the last service, beginning at 4.00pm. In addition, it offers 15 minute slots for committal services, on the hour and half hour. Direct cremations are delivered to the crematorium at any time from 9.00am. They are received via a rear entrance to the building and have no impact upon the use of the chapel for funerals.

10.41 Figure 58 below illustrates the service times available at the Wealden Crematorium, with its single chapel:

	Monday to Friday		
	Funeral start times	**Key**	
	09:00	09:00	Direct Cremation
	10:00		
	11:00		
	12:00		
	13:00		
	14:00		
	15:00		
	16:00		
Slots	**Daily**	**Monthly**	**Annual**
Total slots	7	147	1,764
Core slots	5	105	1,260

Figure 58: Funeral service times available at Wealden Crematorium

10.42 Figure 59 below illustrates the levels of technical, practical and peak month practical capacity at the Wealden Crematorium, as if it were already fully established.

Wealden Crematorium	Year
	2019
Combined annual deaths in catchment area	4,354
Average deaths per month	363
Deaths in peak month	460
Percentage of annual deaths occurring in peak month	10.6%
Annual cremations, minus direct cremations	638
Total slots available	1,764
Level of technical capacity	**36%**
Total core slots available	1,260
Level of practical (core) capacity	**51%**
Average monthly core slots available	105
Average monthly cremations	53
Calculated peak month cremations	67
Level of practical (core) capacity in peak month	**64%**

Figure 59: Hypothetical capacity levels at Wealden Crematorium in 2019

10.43 Figure 59 illustrates that the Wealden Crematorium can be expected to operate at 64% of core capacity in the peak month, significantly lower than other existing crematoria serving the population of the wider area considered in this report. This is a great qualitative benefit for those who will use this crematorium. However, its relatively distant location means that it does not serve the population who would use the Turners Hill Crematorium.

10.44 Capacity at Turners Hill Crematorium

10.45 This section of the report projects the hypothetical core capacity in the peak month at Turners Hill Crematorium, as if it were already established, in order to provide a comparison with existing crematoria.

10.46 Based upon the 1,097 catchment deaths in 2019 shown above in Figure 21, it is reasonable to expect 877 (80%) of these to result in cremation at Turners Hill Crematorium with 10% being direct cremations, were it operational.

10.47 Figure 60 below illustrates the proposed service times available at the Turners Hill Crematorium, with its single chapel:

	Monday to Friday		
	Funeral start times	**Key**	
	09:00	09:00	Direct Cremation
	09:30		
	10:30		
	11:30		
	12:30		
	13:30		
	14:30		
	15:30		
	16:30		
Slots	**Daily**	**Monthly**	**Annual**
Total slots	8	168	2,016
Core slots	6	126	1,512

Figure 60: Funeral service times available at Turners Hill Crematorium

10.48 Figure 61 below illustrates the levels of technical, practical and peak month practical capacity at the Turners Hill Crematorium.

Turners Hill Crematorium	Year
	2019
Combined annual deaths in catchment area	11,960
Average deaths per month	997
Deaths in peak month	1,256
Percentage of annual deaths occurring in peak month	10.5%
Annual cremations, minus direct cremations	789
Total slots available	2,016
Level of technical capacity	**39%**
Total core slots available	1,512
Level of practical (core) capacity	**52%**
Average monthly core slots available	126
Average monthly cremations	66
Calculated peak month cremations	83
Level of practical (core) capacity in peak month	**66%**

Figure 61: Hypothetical capacity levels in 2019

10.49 Figure 61 illustrates that Turners Hill Crematorium would operate at 66% of core capacity in the peak month, significantly lower than existing crematoria serving the population of the area. This would be a significant qualitative benefit to the users of the crematorium.

11. Qualitative need for Turners Hill Crematorium

11.1 Qualitative need is established by considering the impact upon bereaved people of the ability of crematoria to address key issues:

- availability of preferred slots, leading to delays between death and the funeral
- journey times to crematoria
- congestion at crematoria

11.2 Availability of preferred slots

11.3 The Essington Appeal, referenced earlier in this report, sheds useful light on the importance of the availability to bereaved people of dates and times at crematoria to meet their particular needs and preferences:

11.4 *215. Anecdotal evidence from funeral directors who use the cremation service offered at Bushbury indicates that an acceptable qualitative standard is also not being met. In this regard funeral services are taking longer than is acceptable to arrange at times to suit bereaved families and funeral directors are advising some families that earlier services could be arranged at crematoria further away than is generally regarded to be acceptable. The substandard quantitative offer at Bushbury is adversely affecting the crematorium's ability to offer a quality service to bereaved families.*[21]

11.5 *128. "Further, the overtrading has led to unacceptable delays between the date of death and date of cremation. Analysis undertaken by Dignity (and unchallenged by any party to the inquiry) shows that average waiting times between date of death and date of cremation are materially longer than either Telford or other crematoria in the area. This is a very clear qualitative deficiency which has resulted from the quantitative overtrading."*[22]

[21] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire
[22] APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire

11.6 *35. Of greater concern is the evidence submitted indicating the delay between death and funeral. It is apparent from this that over 80% of funerals take place at least 7 days after death. These figures support the perceptions encompassed in submissions from funeral directors and clergy which point to significant difficulty in mourners achieving their preferred time and day for funerals and consequential delays ad compromise. Such pressures are clearly greater in winter with increased delays during January and February in particular, with. Significant proportion extending to over two weeks from date of death. While these delays can only be partly explained by Coroner delays or similar, this presents substantial evidence of pressures on the capacity at Penmount [Crematorium] to meet the qualitative needs of such a large population.*[23]

11.7 It is well established that a number of factors contribute to delays between death and funeral. These factors include:

- the process of registration of the death;
- involvement of the coroner;
- requirement for an autopsy;
- personal circumstances of the family members;
- availability of the Funeral Director and Officiant.

11.8 A key factor contributing to delays between death and funeral is the availability of the family's preferred date and time for the funeral at the crematorium.

11.9 Obituaries published online provide a completely random and independent sample of factual evidence relating to the period between death and cremation. The author of this report undertook a survey of obituaries published on-line, seeking 50 obituaries relating to each of four crematoria as a reasonable sample size. This sample, totalling 200 obituaries, is summarised in Figure 62 below:

[23] APP/D0840/A/09/2098108 Land at Race Farm, Puggis Hill, Treswithian, Camborne, Cornwall

Surrey & Sussex			Woodvale			The Downs			Kent and Sussex		
Death	Funeral	Days	Death	Funeral	Days	Death	Funeral	Days	Death	Funeral	Days
05/11/2019	15/11/2019	10	19/11/2019	29/11/2019	10	15/07/2019	25/07/2019	10	24/07/2018	03/08/2018	10
28/06/2019	12/07/2019	14	30/10/2019	13/11/2019	14	16/08/2019	27/08/2019	11	10/02/2018	22/02/2018	12
06/06/2019	21/06/2019	15	29/10/2019	13/11/2019	15	10/07/2019	22/07/2019	12	09/11/2019	21/11/2019	12
29/07/2019	13/08/2019	15	15/12/2019	30/12/2019	15	16/08/2019	28/08/2019	12	07/11/2019	20/11/2019	13
31/07/2019	15/08/2019	15	03/10/2019	18/10/2019	15	29/06/2019	12/07/2019	13	04/06/2019	20/06/2019	16
31/07/2019	15/08/2019	15	03/10/2019	18/10/2019	15	03/08/2019	16/08/2019	13	21/08/2019	06/09/2019	16
12/06/2019	28/06/2019	16	15/10/2019	31/10/2019	16	09/08/2019	23/08/2019	14	12/08/2019	29/08/2019	17
21/01/2019	07/02/2019	17	14/10/2019	30/10/2019	16	29/07/2019	13/08/2019	15	27/04/2019	15/05/2019	18
20/04/2019	07/05/2019	17	08/10/2019	25/10/2019	17	14/08/2019	29/08/2019	15	09/06/2019	27/06/2019	18
25/06/2019	12/07/2019	17	10/10/2019	28/10/2019	18	30/06/2019	16/07/2019	16	01/08/2019	19/08/2019	18
20/08/2019	06/09/2019	17	14/10/2019	01/11/2019	18	17/07/2019	02/08/2019	16	31/05/2019	19/06/2019	19
16/11/2019	04/12/2019	18	07/11/2019	25/11/2019	18	30/06/2019	17/07/2019	17	24/08/2019	12/09/2019	19
09/12/2019	27/12/2019	18	24/11/2019	12/12/2019	18	27/08/2019	13/09/2019	17	28/09/2019	17/10/2019	19
28/12/2019	15/01/2020	18	21/09/2019	09/10/2019	18	27/07/2019	14/08/2019	18	22/11/2019	11/12/2019	19
22/12/2018	10/01/2019	19	19/10/2019	07/11/2019	19	09/08/2019	27/08/2019	18	20/06/2019	10/07/2019	20
07/02/2019	27/02/2019	20	13/10/2019	01/11/2019	19	30/08/2019	17/09/2019	18	25/06/2019	15/07/2019	20
27/12/2019	16/01/2020	20	26/10/2019	14/11/2019	19	26/06/2019	15/07/2019	19	03/12/2019	23/12/2019	20
06/11/2019	27/11/2019	21	12/10/2019	01/11/2019	20	20/07/2019	08/08/2019	19	06/06/2017	27/06/2017	21
19/12/2019	09/01/2020	21	28/09/2019	18/10/2019	20	18/08/2019	06/09/2019	19	22/07/2019	12/08/2019	21
12/12/2018	03/01/2019	22	28/09/2019	18/10/2019	20	23/07/2019	12/08/2019	20	04/10/2019	25/10/2019	21
14/03/2019	05/04/2019	22	26/11/2019	16/12/2019	20	20/07/2019	09/08/2019	20	29/10/2019	19/11/2019	21
16/04/2019	08/05/2019	22	16/10/2019	06/11/2019	21	10/08/2019	30/08/2019	20	18/09/2018	11/10/2018	23
16/06/2019	08/07/2019	22	04/10/2019	25/10/2019	21	31/08/2019	20/09/2019	20	27/05/2019	19/06/2019	23
09/10/2019	01/11/2019	23	24/12/2019	15/01/2020	22	26/06/2019	17/07/2019	21	28/08/2017	21/09/2017	24
01/01/2020	24/01/2020	23	05/11/2019	27/11/2019	22	24/06/2019	15/07/2019	21	31/08/2019	24/09/2019	24
13/01/2019	06/02/2019	24	24/11/2019	16/12/2019	22	30/07/2019	20/08/2019	21	22/09/2019	16/10/2019	24
10/02/2019	06/03/2019	24	24/10/2019	15/11/2019	22	03/07/2019	25/07/2019	22	26/05/2019	20/06/2019	25
25/03/2019	18/04/2019	24	25/11/2019	18/12/2019	23	10/07/2019	01/08/2019	22	13/06/2019	08/07/2019	25
03/08/2019	27/08/2019	24	15/10/2019	07/11/2019	23	23/07/2019	14/08/2019	22	15/12/2019	09/01/2020	25
16/12/2019	09/01/2020	24	02/11/2019	25/11/2019	23	30/07/2019	21/08/2019	22	21/12/2019	15/01/2020	25
23/12/2019	17/01/2020	25	01/10/2019	25/10/2019	24	05/08/2019	27/08/2019	22	30/06/2019	26/07/2019	26
21/11/2019	17/12/2019	26	15/11/2019	09/12/2019	24	08/08/2019	30/08/2019	22	20/07/2019	15/08/2019	26
04/01/2019	01/02/2019	28	27/10/2019	21/11/2019	25	27/08/2019	18/09/2019	22	07/08/2019	02/09/2019	26
11/01/2019	08/02/2019	28	18/11/2019	13/12/2019	25	10/07/2019	02/08/2019	23	17/08/2019	12/09/2019	26
17/01/2019	14/02/2019	28	27/09/2019	22/10/2019	25	31/07/2019	23/08/2019	23	01/11/2019	27/11/2019	26
27/06/2019	25/07/2019	28	31/10/2019	26/11/2019	26	17/08/2019	09/09/2019	23	08/05/2019	04/06/2019	27
25/07/2019	22/08/2019	28	02/11/2019	28/11/2019	26	17/08/2019	09/09/2019	23	21/06/2019	18/07/2019	27
26/07/2019	23/08/2019	28	08/11/2019	06/12/2019	28	05/07/2019	29/07/2019	24	22/05/2018	19/06/2018	28
06/01/2019	05/02/2019	30	06/11/2019	04/12/2019	28	09/07/2019	02/08/2019	24	28/06/2019	26/07/2019	28
11/05/2019	10/06/2019	30	02/12/2019	30/12/2019	28	30/07/2019	23/08/2019	24	21/12/2016	19/01/2017	29
05/07/2019	05/08/2019	31	22/11/2019	20/12/2019	28	17/08/2019	10/09/2019	24	29/07/2019	27/08/2019	29
08/10/2019	11/11/2019	34	08/10/2019	05/11/2019	28	22/08/2019	16/09/2019	25	26/09/2019	28/10/2019	32
16/01/2019	20/02/2019	35	12/09/2019	10/10/2019	28	12/07/2019	08/08/2019	27	04/08/2019	06/09/2019	33
30/08/2019	04/10/2019	35	20/12/2019	20/01/2020	31	10/06/2019	09/07/2019	29	03/12/2019	06/01/2020	34
19/01/2019	25/02/2019	37	04/11/2019	06/12/2019	32	23/06/2019	22/07/2019	29	16/04/2018	21/05/2018	35
01/04/2019	08/05/2019	37	13/09/2019	15/10/2019	32	10/09/2019	09/10/2019	29	05/05/2019	11/06/2019	37
17/10/2019	25/11/2019	39	27/10/2019	29/11/2019	33	21/07/2019	20/08/2019	30	08/09/2019	15/10/2019	37
07/12/2019	17/01/2020	41	30/11/2019	03/01/2020	34	28/08/2019	27/09/2019	30	08/06/2019	16/07/2019	38
17/12/2018	29/01/2019	43	05/12/2019	09/01/2020	35	08/07/2019	12/08/2019	35	18/10/2019	26/11/2019	39
21/02/2019	24/04/2019	62	20/09/2019	25/10/2019	35	20/08/2019	27/09/2019	38	11/09/2019	28/10/2019	47

Figure 62: 200 Obituaries sorted by period between death and funeral

11.10 Figure 63 below summarises these data:

Crematorium	Obituaries	Days between death and funeral			Funerals delayed beyond average period
		Minimum	Maximum	Average	
Surrey and Sussex	50	10	62	25	38%
Woodvale	50	10	35	23	40%
The Downs	50	10	38	21	48%
Kent and Sussex	50	12	47	25	48%
Averages		**11**	**46**	**23**	**44%**

Figure 63: Days between death and funeral

11.11 These data suggest average delays of over three weeks between death and funeral, with an average of 44% of funerals delayed even longer. Such delays will inevitably increase in line with projected increases in deaths, with consequent increases in the practical capacity usage levels at existing crematoria. This is further evidence of the qualitative need for the proposed Turners Hill Crematorium.

11.12 Journey times to crematoria

11.13 This report has previously quantified the need for the new Turners Hill Crematorium by reference to journey times, using drive-time catchment mapping software.

11.14 Minimising travel time also has qualitative impacts upon the bereaved, Funeral Directors and those officiating at funerals.

11.15 There is great variation in the way people arrange funerals, influenced by personal, social, cultural, religious, financial and other factors. The secularisation of society has affected the level of attachment people may have to their local church and many people no longer live within the same communities as previous generations of their families.

11.16 However, funerals are still widely regarded as important events requiring the attendance of family, friends and others who knew the person who has died. Statistically, the probability is very high that a funeral will result from the death of someone of senior years, who has spent a lifetime building up a network of contacts, many of whom will be local to where they live and work. It is entirely logical therefore that this group of people would wish to gather together for the funeral in a location that is convenient for most of them. The new Turners Hill Crematorium will benefit a significant population within West Sussex, through its location that is far more convenient for them than other crematoria.

11.17 By their nature, funerals are emotional events signifying the end of many different relationships with a single person and a change in the relationships that those still living have with each other. Enduring unnecessarily long journeys, often involving traffic congestion and the challenges of keeping a group of vehicles together, is altogether undesirable for a group of mourners on their way to the crematorium for an emotional life event.

11.18 Congestion at crematoria: the 'conveyor belt' experience

11.19 The number and types of vehicles attending funerals at crematoria varies and inevitably there are occasional funerals of some-one who was young and/or particularly well-known where access and parking space is insufficient to cope. However, the more common situation where the site is congested occurs where vehicle numbers per funeral are modest, but there are too many funerals on site at the same time.

11.20 This situation arises all too frequently for a number of reasons, the main ones being:

- A funeral arrives at the crematorium either too early or too late
- A funeral takes too much or too little time at the crematorium

11.21 Funeral Directors take pride in arriving at the correct time at each of the various locations that may be involved in a funeral, including the crematorium. However, there are sometimes factors outside of their control, or which could not reasonably be foreseen, which can advance or delay the time when they arrive at the crematorium gates. A funeral can involve a series of events each involving different people, who can have a cumulative impact upon the schedule of the particular funeral. For example, the funeral service held at the church prior to a committal service at the crematorium can last less or more time than expected, influencing the time of arrival at the crematorium.

11.22 If there are other funerals taking place around their particular funeral slot, the arrival of one group of mourners early or late can easily result in vehicles and mourners from different funerals becoming mixed up. This is particularly prevalent at crematoria such as the Surrey and Sussex Crematorium, Woodvale, The Downs and the Kent and Sussex Crematorium, where there is a choice of funeral service chapel.

11.23 If a funeral service at the crematorium lasts longer than allowed for within the service slot, the mourners leave the chapel late. Where there is a funeral immediately following theirs, which is a common situation, that group of mourners will have had difficulty finding somewhere to park their cars, as the car park is still occupied by the cars belonging to mourners of the overrunning funeral. They will then have to queue up outside the chapel entrance waiting for their funeral service to start late because the other group of mourners are still inside the chapel.

11.24 This situation can easily have a knock-on effect on all of the subsequent funerals in the day at a busy crematorium. It can be quite common for funerals to be running behind schedule and for there to be a tangible atmosphere of congestion and tension after a morning funeral falls out of match with the schedule.

11.25 This all too easily has a qualitative impact upon the experience of bereaved people. Similarly, Funeral Directors delayed by one funeral face challenges in minimising the impact that this has on their ability to undertake the other funerals they have arranged for the same day.

11.26 In the Camborne Appeal Decision[24], the Inspector Mike Robins stated:

11.27 *34. Although I have considered the theoretical capacity of Penmount under quantitative need, I turn now to the quality of the funeral experience it can provide. I had the opportunity to visit Penmount at a time when three consecutive funerals were taking place in each chapel. There is no question that the setting is exceptional and no evidence is before me to suggest that the management and staff are anything less than highly professional in the service they provide. However, accepting that this was only a snapshot, the site at the time of my visit was busy with a large number of cars parked around the chapels and a lot of people moving around the immediate area.*

11.28 The essence of a funeral is that it is centred upon a unique individual and the distinct group of people that were familiar enough with that person to attend their funeral. This uniqueness is fatally compromised by congestion and delay, or rush, at the crematorium and the sense that one is simply travelling on a 'conveyor-belt' through the crematorium funeral experience.

11.29 A report 'Cost, quality seclusion and time: What do UK customers want from a cremation funeral?', published by Trajectory in 2018, provides helpful information when considering qualitative aspects of crematoria provision. It refers to the customers' perception of the 'conveyor-belt' experience and Professor Douglas Davies is quoted at the beginning of the report:

[24] Appeal Ref. APP/D0840/A/09/2098108 Land at Race Farm, Puggis Hill, Treswithian, Camborne, Cornwall

11.30 *At a time of unprecedented choice over many aspects of life this important research clearly maps many contemporary attitudes to funerals. In pinpointing the image of the 'conveyor belt' as a popular expression of how mourners can feel too processed at crematoria it brings statistical weight to my own observations of some thirty years ago that is was not actual machinery but that sense of being processed that made many unhappy*.

11.31 The report highlights sufficient service interval length as being of key importance and how this directly links with the 'conveyor-belt' feeling, generated by seeing mourners from other funerals.

11.32 *The focus groups emphatically suggested that privacy was of the utmost importance. People want to be able to remember their loved one in their chosen way without interruption. It emerged that time and slot length were crucial to this because seeing mourners from other funeral services was particularly unwelcome and intrusive. These findings were borne out by the quantitative research… A clear majority of people agree both that 30 minutes is not long enough for a cremation service (59%), and that services should last at least 45 minutes (also 59%). The more general question, that does not focus on specific slot lengths in minutes but emphasises the importance of not seeing mourners from earlier or later services received even more support with almost four out of five (78%) agreeing with the statement…This all points to the importance of slot length and not feeling rushed. However, … it is seeing other mourners that contributes most to the perception of being on a conveyor belt. This question was only asked of those people who said that they'd had a conveyor belt experience. Of course, there is also a link between overall slot length and not seeing other mourners. The longer the slot length the greater chance that people can have the length and type of service they want. For most people this would involve a length of slot that allows a period of time either side of the actual service so that they can pay their respects, speak to friends and relatives (who may often not have seen each other for a long time) and still not encounter other mourners*.

11.33 The research found that 90% of Funeral Directors and 78% of customers agreed with the statement:

11.34 *There should be sufficient time between services so that you do not see mourners from the previous or following service.*

11.35 The research identifies a core set of six customer needs from a cremation funeral:

- *Making sure that all the people who want to attend can attend*
- *Finding a convenient slot*
- *Not seeing other mourners - enough time in the chapel and a period of time around the service*
- *Keeping the absolute cost within budget*
- *Value – aside from cost, making sure that the service delivers the desired experience in terms of having sufficient time to remember their loved one in their way*
- *Personalisation*

11.36 The report's Executive Summary emphasizes the importance that customers place on having sufficient time at the crematorium:

11.37 *Ultimately, having enough time at the crematorium is more important to most people than the cost. The cost of a cremation had little impact on perception of value*.

11.38 At a twin chapel crematorium, working at over 80% of core capacity during peak months, it is extremely unlikely that that these six identified needs can be met.

11.39 The new Turners Hill Crematorium will offer 60-minute funeral intervals. Even if all five core slots in a day were booked, this generous interval time will minimise the possibility of congestion occurring, particularly as there is only a single chapel and sufficient visitor car parking spaces carefully planned.

11.40 People will be able to arrive, park, enter the building, experience the funeral and leave the site with a sense that they are the only people on site and the only funeral that day. This will have a memorable impact upon their experience of the death of the person they knew.

11.41 Meeting the needs of the present and future generations

11.42 This report seeks to avoid criticism of the existing crematoria serving the area and, in particular, any criticism of the people owning, operating or working at them. In all cases, the facilities have been renovated and improved several times since being built. However, all of these buildings and sites are in one way or another compromised when it comes to meeting the requirements of the 21st century, as they were designed and built in a different age, when there was significantly less demand for cremation.

- Surrey and Sussex Crematorium, Crawley was built in 1956.

- Woodvale Crematorium, Brighton was built in 1930 and is located in a cemetery opened in 1856.

- The Downs Crematorium, Brighton was built in 1941 and is located in a cemetery opened in 1886.

- Kent and Sussex Crematorium, Tunbridge Wells was built in 1958 and is located in a cemetery opened in 1886.

11.43 They vary in design, but to one degree or another all reflect the design of English ecclesiastical buildings, as can be seen in the photographs below. In particular, Woodvale's three chapels and the Cemetery Chapel at the Kent and Sussex Crematorium are modelled like churches.

Surrey & Sussex Crematorium

St Richards Chapel

Memorial (St Michaels) Chapel

Woodvale Crematorium

North Chapel

Woodvale Crematorium

South Chapel

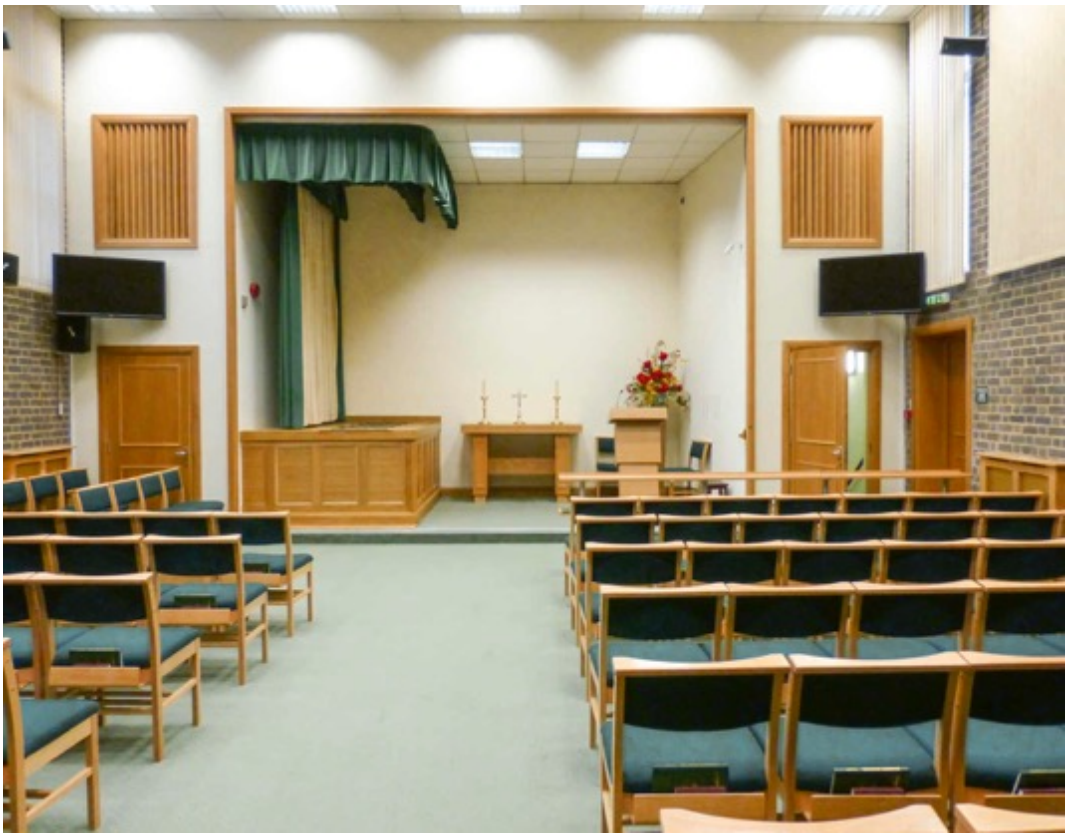
Extra Mural Chapel

The Downs Crematorium

Main Chapel

Family Chapel

Kent and Sussex Crematorium



Crematorium Chapel

Cemetery Chapel

11.44 In contrast, the photographs below illustrate examples of contemporary designs of UK crematoria chapels.

Bierton Crematorium

Babworth Crematorium

Note: the wooden cross behind the lectern is readily removable.

Great Glen Crematorium

Note: the wooden cross behind the lectern is readily removable.

Chilterns Crematorium

11.45 The proposed Turners Hill Crematorium will be built to a contemporary design, without reflecting any particular religion, informed by the experience of the past and present. It will be able to provide a much higher quality environment for bereaved people, Funeral Directors and other users than is possible at established crematoria designed for the last century.

11.46 The evidence from published obituaries of deaths in early 2019 demonstrates an average three-week wait for a funeral. The availability of preferred slots at crematoria is a key factor contributing to these delays, which will extend further with projected increases in numbers of deaths. The new Turners Hill Crematorium will significantly improve the availability of core funeral service times for local people.

11.47 The evidence from drive-time catchment analysis quantifies the significant numbers of local people who will benefit from shorter funeral journey times to the new Turners Hill Crematorium, as compared to existing crematoria.

11.48 In the Camborne Appeal Decision[25], the Inspector Mike Robins stated:

11.49 *38. I place significant weight on the needs of the bereaved and conclude that the proposed crematorium would result in benefits not only in terms of the times involved in travelling to and from funerals, but also in provision of appropriate timescales for funerals to take place and potentially the experience on-site which may currently be under pressure at the busiest times of year. These benefits would accrue not only to those who would be served by the proposed crematorium, but to a wider population now served by Penmount.*

11.50 The new Turners Hill Crematorium will offer contemporary design and facilities that will provide an attractive venue in which people can congregate and celebrate the lives of their loved ones with a sense of space and privacy.

[25] Appeal Ref. APP/D0840/A/09/2098108 Land at Race Farm, Puggis Hill, Treswithian, Camborne, Cornwall

11.51 At the Beetham Hall Appeal[26], the Inspector M Seaton stated:

11.52 *31. My attention has not been drawn to any recent provision of new crematoria or an increase in available capacity within the area. I have noted the contention of interested parties in respect of existing crematoria not operating at full capacity, but accept the appellant's point that the notion of 100% operation at crematoria would be theoretical due to the technical limitations of equipment and the unpopularity of certain slots during the day. Whilst I have also considered the interested parties point as to whether convenience for users and accessibility should translate into need, I am satisfied that need must realistically comprise both quantitative and qualitative elements. In this respect, the desirability of reducing the need to travel, coupled with the current indicative capacity and delays experienced at existing crematoria as well as demographic trends showing the District to have an ageing population, demonstrates to my satisfaction that on the balance of the evidence before me that there is a need for additional crematorium facilities in the district. I note that the Council's Delivery Plan has indicated the historic difficulties of establishing an appropriate site for a crematorium, and I therefore would conclude that addressing this identified need would clearly be in the public benefit, and would add substantial weight in support of the proposals.*

11.53 There is a compelling qualitative need for the new Turners Hill Crematorium.

This report has been read and approved for submission to MSDC by Andrew Tabachnik QC of 39 Essex Chambers

[26] Appeal Ref: APP/M0933/W/15/3003034 Fishwicks Ltd. Beetham Hall, Beetham, Milnthorpe LA7 7BQ

Appendix: Survey of Funeral Directors

Intro. In spite of their workload during the coronavirus pandemic, four out of twenty Funeral Directors invited managed to complete a questionnaire, with the questions and responses shown below.

1. Please indicate which of the following locations you currently use for cremation funerals and the approximate proportion of your cremation funerals that you take to each crematorium.

Crematorium	< 25%	25%-50%	50%-75%	75%-100%
Kent and Sussex, Tunbridge Wells	50%	25%		
Surrey & Sussex, Crawley		25%	75%	
The Downs, Brighton	75%			
Wealden, Horam	50%			
Woodvale, Brighton	25%	50%		

2. Typically, how long does it take for your hearse and funeral cortège to drive to each location?

Location	Journey time in minutes			
	Up to 15	15 to 30	30 to 45	Over 45
Kent and Sussex, Tunbridge Wells			75%	25%
Surrey & Sussex, Crawley		50%	25%	
The Downs, Brighton			50%	
Wealden, Horam			25%	50%
Woodvale, Brighton			50%	

3. Typically, what proportion of your funerals involve the following arrangements?

Funeral arrangements	< 25%	25%-50%	50%-75%	75%-100%
Hearse and cortège to crematorium		50%	50%	
Hearse only to crematorium		25%	75%	
Direct cremation	100%			

4. There are various factors that influence people's choice of location for a cremation funeral service. In your experience and opinion, what are the most important factors?

Factor	Ranking				
	1 is most important - 5 is least important				
	1	2	3	4	5
Proximity / journey time		75%	25%		
Cost	25%		50%		
Availability of preferred date and time		50%	50%		
Duration of funeral service interval		75%	25%		
Quality of service and facilities offered	25%	50%		25%	
Appearance of building and grounds	25%	25%	25%	25%	
Facilities for Funeral Director's staff			50%		50%
Family's preference	100%				

5. Please indicate which you consider to be the most significant positive aspects of the locations that you use, that you value for both yourself and your clients.

Location	Proximity	Cost	Availability	Service Interval	Services offered	Appearance	Facilities for FDs
Kent and Sussex	25%	25%			25%	25%	25%
Surrey & Sussex	100%	25%	25%	75%	50%	50%	50%
The Downs	50%	50%		25%			
Wealden	25%				25%		25%
Woodvale	50%	50%	25%	50%	25%		

6. There are various factors that combine to influence the length of time between death and funeral. In your experience, what is the average length of time during normal levels of demand and during seasonal peak periods of demand?

Number of deaths	Days between death and funeral				
	10	10 to 15	15 to 20	20 to 25	> 25
Average / Summer	75%	25%			
Peak / Winter		25%	25%	25%	

7. Do you think that there are enough crematoria in the area to meet the current and foreseeable future needs of bereaved people and Funeral Directors?

Statement	Yes	No
There are enough crematoria in the area to meet current need	50%	50%
When contacting the crematorium to make a booking, a preferred day and time for a funeral is usually readily available	50%	50%
Existing crematoria have sufficient core times available on most days	50%	50%
There are enough crematoria in the area to meet foreseeable future need	25%	75%

8. Do you think that there are enough Green Burial sites in the area to meet current and foreseeable future needs of bereaved people and Funeral Directors?

Statement	Yes	No
There are enough Green Burial sites in the area to meet current need	25%	75%
There are enough Green Burial sites in the area to meet foreseeable future need	25%	75%
The proportion of clients preferring Green Burial is increasing	50%	50%

9. What are your views on the need for, and the benefits of, the development of a new crematorium at Turners Hill?

Statement	Agree	Disagree
A new crematorium is needed at Turners Hill to better serve the needs of people in the area.	50%	50%
A new crematorium at Turners Hill would be well located to meet the needs of Funeral Directors serving the people in the area.	50%	25%
A new crematorium at Turners Hill would reduce funeral journey times for people in the area.	75%	25%
A new crematorium at Turners Hill would provide greater choice and availability of service times to bereaved people and Funeral Directors than is currently available.	100%	0%
Through offering an additional capacity for funerals, a new crematorium at Turners Hill would enable funerals to be arranged more quickly than at present.	25%	75%
60-minute service intervals at a new crematorium at Turners Hill would be a benefit to mourners.	75%	25%
60-minute service intervals at a new crematorium at Turners Hill would be a benefit to Funeral Directors.	50%	50%

10. What are your views on the need for, and the benefits of, the development of a new Green Burial site at Turners Hill?

Statement	Agree	Disagree
A new Green Burial site is needed at Turners Hill to better serve the needs of people in the area.	75%	0%
A new Green Burial site at Turners Hill would be well located to meet the needs of Funeral Directors serving the people in the area.	75%	25%
A new Green Burial site at Turners Hill would reduce funeral journey times for people in the area.	50%	50%
A new Green Burial site at Turners Hill would provide greater choice and availability of service times to bereaved people and Funeral Directors than is currently available.	75%	25%