

# **Summary Proof of Evidence of**

**Peter Mitchell FICCM(Dip)**

## **The need for a new crematorium**

Land at Natural Burial Site, Turners Hill Road,  
Turners Hill, RH10 4PB

Hartmires Investments Ltd

PINS Ref: APP/3266563

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# 1 Executive Summary

- 1.1 There is a compelling quantitative and qualitative need for a new crematorium, located at Turners Hill. Primarily, this need arises from the pressing requirement to provide additional capacity for the catchment of the significantly over-trading Surrey and Sussex Crematorium at Crawley.
- 1.2 In 2019, the twin chapel Surrey and Sussex Crematorium undertook a total of 2,930 cremations and it was the 11<sup>th</sup> busiest crematorium out of 307 in the whole of the UK.
- 1.3 It is also the most expensive crematorium in the UK, jointly with nine other crematoria operated by its owner Dignity Funerals Limited (Dignity). The charge at the Surrey and Sussex Crematorium is one third more than the average charge at UK crematoria.
- 1.4 Its UK ranking, both in terms of high numbers of funerals and high price, indicates that there is a lack of competition within its large catchment area, resulting in a lack of choice for bereaved people, who must wait longer than acceptable to book a slot (associated average periods between death and cremation being over 3 weeks virtually year-round and closer to 4 weeks in the peak winter period).
- 1.5 The Downs Crematorium (Dignity) and Woodvale Crematorium (Brighton and Hove District Council) each have two chapels and are located on adjacent sites in Brighton. In contrast to the Surrey and Sussex Crematorium's fee of £1,070, both Brighton crematoria charged only £633 in 2019.
- 1.6 The two Brighton crematoria have a combined catchment population of 445,744 (data from Beacon Dodsworth (BD)) and in 2019 together undertook 2,747 cremation funerals, excluding direct cremations. This was an average of 687 cremation funerals per chapel that year.

- 1.7 In contrast, the Surrey and Sussex Crematorium has a catchment population of 401,860 (data from BD) and in 2019 undertook 2,841 cremation funerals, excluding direct cremations. This was an average of 1,420 cremation funerals per chapel that year.
- 1.8 In the first Essington Planning Appeal decision<sup>1</sup> [CD 12.4], 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. The Secretary of State's first decision letter endorsed this approach. The Essington appeals found substantial need for new capacity as a consequence of over-trading at Bushbury Crematorium (a less busy facility than Surrey and Sussex), ultimately justifying consent for 2 new crematoria, both located in the Green Belt.
- 1.9 In addition, the first Essington Inspector 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."*<sup>2</sup>
- 1.10 The Surrey and Sussex Crematorium operates well above 80% of its practical capacity in the peak month of demand. The sheer volume of funerals and the 45 minute slot times combine to make it a very busy crematorium site, which in the words of the Inspector is likely to lead to *"a conveyor-belt experience for mourners"*.

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<sup>1</sup> APP/C3430/W/15/3039163 Land off Broad Lane, Essington, South Staffordshire para 215

<sup>2</sup> Ibid para 216

- 1.11 In my judgment, preferred core times for funerals to commence lie between 10.30am and 3.30pm. Analysis of usage patterns for crematoria strongly support these periods as bereaved peoples’ preferred core slots, with other periods generally only significantly used where such core slots are already taken up and the alternative choice is a longer wait.
- 1.12 Dignity, in objecting to the appeal proposal, widen the definition of core hours, which reduces the apparent trading level of crematoria. These measures purport to provide an additional 504 core time funeral slots per year. Dignity’s objection to the appeal proposal ignores its clearly stated position elsewhere that one hour funeral service interval times are essential to safeguard the interests of bereaved people. By contrast, Surrey and Sussex Crematorium’s two chapels both continue to operate with 45 minute intervals – plainly an essential part of Dignity’s business model for this facility.
- 1.13 The table below summaries the average levels of practical (core) capacity working at four crematoria included within this proof of evidence. The table shows both even and uneven use of chapels, where applicable.
- 1.14 For the Surrey and Sussex Crematorium, the first column is based upon my original understanding of service time availability and my view on times of core services. The second column reflects Dignity’s alleged alternative classification.

Level of practical (core) capacity in peak month	Averages for 2016 to 2019 inclusive				
	Surrey & Sussex		Woodvale	Downs	Kent & Sussex
	PMA	Dignity			
Even use of each crematorium's chapels	108%	95%	85%	56%	82%
Uneven use of each crematorium's chapels	130%	114%	85%	74%	132%

*Figure 1: Summary of average levels of practical (core) capacity in peak months of demand*

- 1.15 Whilst the capacity levels at the three more distant crematoria are noteworthy, the crematorium closest to the appeal site, Surrey and Sussex Crematorium, is working significantly above 80% of its practical capacity during peak months. Even using Dignity’s own classification of service times and assuming an even use of both chapels, the Surrey and Sussex is operating at 95% of its Practical (core) capacity during the peak month of demand.
- 1.16 Based upon ONS projected increases in catchment deaths by 2043, increased levels of overcapacity working at the Surrey and Sussex and other crematoria in the region are the only logical outcome, without the development of additional crematorium capacity to meet the needs of the catchment population.
- 1.17 Drive-time catchment analysis by two different companies (Vectos Limited (Vectos for the Appellant) and BD for the Council)), each employing different software and geographical units, is summarised in the table below. Coupled with the clear evidence of overtrading at the Surrey and Sussex Crematorium, these catchment populations demonstrate the significant quantitative need for Turners Hill Crematorium.

Population				Description
Vectos	Beacon Dodsworth	Average	Difference	
11,755	40,489	26,122	28,734	People living within 15 minutes’ drive-time
10,008	29,753	19,881	19,745	People living within 15 minutes’ drive-time of a crematorium for the first time
<b>88,305</b>	<b>114,978</b>	<b>101,642</b>	<b>26,673</b>	<b>People living within 30 minutes’ drive-time</b>
43,532	38,847	41,190	(4,685)	People living within 30 minutes’ drive-time of a crematorium for the first time
<b>122,916</b>	<b>122,234</b>	<b>122,575</b>	<b>(682)</b>	<b>People living within 45 minutes’ drive-time</b>

Figure 2: Drive-time catchment populations

- 1.18 The proposed new Turners Hill Crematorium would create new additional capacity for up to six core funeral service times per weekday, if commencing at 10.30am. This would equate to an additional 1,512 core slots per year.
- 1.19 The new Turners Hill Crematorium would offer additional choice for people to arrange a funeral on their preferred date and time for either natural burial or cremation, in closer proximity to where they live and at a lower cost.
- 1.20 In contrast to the 45 minute service interval at the very busy twin chapel Surrey and Sussex Crematorium, the 60 minute service interval likely to be offered in the single chapel at Turners Hill Crematorium, where there will be far fewer funerals taking place each day, will result in much greater privacy and space for each funeral party.
- 1.21 The drive-time catchment analysis indicates that in 2018, 1,205 deaths occurred within Turners Hill Crematorium's catchment area. Applying a national cremation rate of 80% suggests that 964 of these deaths would result in cremation.
- 1.22 The catchment analysis also suggests that, with Turners Hill in operation, Surrey and Sussex Crematorium would undertake 890 less cremations per year. The beneficial impact of this would be to reduce the level of practical capacity at Surrey and Sussex Crematorium to below the 80% quantitative standard.
- 1.23 It is neither feasible nor desirable to increase capacity at the Surrey and Sussex Crematorium by building a third chapel. In any case, the increase in vehicles and people attending funerals in three chapels would further compromise the qualitative offer at the crematorium.
- 1.24 It is unsurprising that Dignity should object to the proposed Turners Hill Crematorium, as it would divert cremations away from the Surrey and Sussex Crematorium.

1.25 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 existing crematoria. In view of the current levels of over-capacity working, there is a clear and compelling quantitative need for addition crematoria provision. The location of the proposed Turners Hill Crematorium will enable it to meet both the current and future needs of a significant and growing population.

1.26 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. A sample of 194 obituaries relating to funerals at the Surrey and Sussex Crematorium indicates an average delay between death and funeral of over three weeks.

1.27 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.
- Provide greater choice for local people wishing to arrange a cremation.