



Ministry of Housing,
Communities &
Local Government

Crematoria Provision and Facilities

Government Response to the Review

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Response to review carried out by the Ministry of Housing, Communities and Local Government.

This information is also available at <https://www.gov.uk/mhclg>

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Introduction

1. In the July Budget 2015, the then Chancellor announced a review of the size and provision of crematoria facilities to make sure they are fit for purpose and sensitive to the needs of all users and faiths. The review was announced in response to concerns about the capacity of crematoria, in particular to accommodate Hindu, Sikh and Jain cremations, at which traditionally larger numbers of mourners wish to attend. In addition, there were concerns that crematoria do not always pay sufficient regard to the cultural sensitivities of different faiths.
2. We sought informal advice from key faith groups, the Local Government Association and industry service providers during autumn 2015. This led us to conclude that a more formal review was necessary to establish the scale of concerns. During the consultation period, we held three roundtable discussion events in London and Leicester with industry providers and groups representing faith and other communities.
3. Views were sought from faith and other community groups and providers on the following themes:
 - Crematoria provision in England, including proximity to the nearest crematoria and demand for new facilities.
 - Size and capacity of crematoria, including ability to accommodate large groups of mourners and availability of service times.
 - Crematoria facilities, including:
 - accommodation and amenities to meet particular cultural or religious traditions;
 - iconography to meet the needs of faith or other community groups;
 - car parking to accommodate large groups of mourners.
 - Staff training which pays sufficient regard to the cultural sensitivities of different faiths and other community groups.
4. We asked the users and providers of crematoria different questions under these headings to get a full understanding of the key issues for all groups, including faith groups, local authorities and private sector providers. A list of respondents is at Annex A. We are very grateful to all respondents for the wide range of experiences, opinions and suggestions they offered across all of the areas on which we sought views.
5. This document summarises the responses to the review consultation and explains next steps. It will be of interest to the owners and operators of crematoria in England (referred to as “providers”); local burial authorities with statutory responsibilities to provide and maintain burial grounds or cemeteries including the provision and maintenance of crematoria; faith and other community groups in England.
6. If you have any questions regarding the review or its response, please contact:

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7. If you have any complaints or comments about the consultation process, please contact:

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Summary of responses

1. We received 153 responses to the consultation from a range of organisations and individuals, including local authorities, representative bodies, private sector crematoria providers, bereaved family members, voluntary organisations, faith groups and funeral directors. 103 of the respondents considered themselves to be a user of crematoria, with 48 from providers of crematoria and in two cases the respondents did not indicate their role.
2. 112 respondents provided statistical information through our on-line survey. A further 41 provided responses through other formats. Where possible, we have categorised these responses under relevant questions in the consultation for the purposes of analysis.
3. The following table breaks down the responses by religion or belief¹:

Self-reported religion	Number	Proportion of Respondents (%)
Hindu	43	28.1
Pagan	18	11.8
Christian	6	3.9
Sikh	5	3.3
Multiple faiths	4	2.6
Jain	2	1.3
Jewish	2	1.3
Godless Spirituality	1	0.7
Humanist	1	0.7
Secular	1	0.7
Not specified / Not applicable	70	45.8
Total	153	100.0

¹ As part of their response, respondents were asked to report the religion(s)/belief(s) that they identify with.

Cremation Provision in England

4. We asked a number of questions about access to crematoria to understand whether concerns from particular faith groups were indicative of underlying shortages of crematoria, either across the country or in specific localities. We were also interested in demand for new facilities and whether there are barriers to developing or expanding crematoria.
5. Views were invited on the following questions:

Q6-7 Have you experienced any problems with accessing crematoria in your local area to meet the needs of your faith or community?

6. 81 out of 103 users responded to this question. 59% (48 respondents) reported that they had experienced problems with accessing crematoria.
7. The majority of respondents commented on access to crematoria in specific localities. Some felt that there was good access to crematoria locally. For example:

“there have not been any problems in accessing any crematoria. This is partly as members of the faith group are reasonably well versed in accessing the number of crematoria that friend/ families have used before and secondly the majority of the Sikh temples have a Board Management and members know (from previous experience) which funeral directors to approach”. Sikh respondent, Keighley, West Yorkshire.

8. Others highlighted concerns, particularly in Leicestershire and North-West London where there are large Hindu, Sikh and Jain populations. For example:

“at times the community have to book and make arrangements to travel to Loughborough or Nuneaton. It is difficult to find adequate slots for cremations in Leicester. These occur on regular basis and the communities have to wait for days to cremate their loved ones thus causing a lot of stress and anxiety.” Federation of Hindu and Jain Communities, Leicestershire.

9. Several respondents highlighted that there are no crematoria facilities in Harrow and those users need to travel to either Hendon or Golders Green. Some respondents argued that there was a need for a new crematoria in Hertfordshire to accommodate the Hindu, Sikh and Jain population and their typically higher number of mourners. This was endorsed by the Institute of Jainology who claimed that people in London need to travel long distances and therefore have to allocate a full day to attend the ceremony if it is scheduled for the middle of the day.
10. More broadly, respondents highlighted that in rural areas, a family's choice for cremation may involve a long journey. For example:

“we have experienced few problems in urban areas in England and Wales. In some rural areas, a family's choice for cremation may involve a long motor journey.” The Churches' Funerals Group.

Q8-9 Do you consider there is a need for new crematoria in your area?

11. 35 out of 48 providers responded to the question. 23% (8 respondents) stated that they considered there was a need for new crematoria in their area. 44 users also

answered this question, with 68% (30 respondents) indicating that they considered there was a need for new crematoria in their area.

12. A number of respondents provided evidence that new crematoria were being developed. In evidence to the All-Party Parliamentary Group for Funerals and Bereavement, the Association of Private Crematoria and Cemeteries stated that since 1985, 56 new crematoria have been built, 48 of which were privately funded. The Federation of Burial and Cremation Authorities said that 35 new crematoria have been built over the last sixteen years. Dignity Funerals Limited said that they have developed numerous crematoria in the past ten years; Memoria Ltd has completed twelve crematoria since 2005; and the Westerleigh Group have developed fourteen crematoria in the past 25 years.
13. Most providers felt that there was spare capacity at the majority of crematoria. Memoria Ltd said that it was common across the country for up to 40% of timeslots per week not to be used. Durham County Council also noted that in 2015 there was 49% unused capacity at their Mountsett Crematorium and 29.5% at their Durham Crematorium. Many local authorities who responded, such as Coventry City Council and Tunbridge Wells Borough Council, felt that there were sufficient numbers of crematoria within their vicinity and therefore did not see the need for a new crematorium.
14. The National Association of Funeral Directors disagreed saying that they did not believe there are sufficient crematoria in England to satisfactorily service current demand, leading to the bereaved having to wait longer for their preferred service time. Some respondents recognised that there was a need for new crematorium developments in a number of areas which were poorly served for cremation.
15. There were mixed views on the need for further crematoria provision in the future. The Association of Private Crematoria and Cemeteries commented that there was a need for new crematoria in several parts of the country because of the ageing population which will be realised over the next two decades. However, Memoria Ltd said that they did not expect the current cremation ratio to increase significantly as population growth was more likely to be amongst those faiths and ethnicities who do not cremate. The Federation of Burial and Cremation Authorities said that there were potentially around ten opportunities left in England, Scotland and Wales to introduce new crematoria that are viable to carry out sufficient numbers of cremations a year.

Q10-11 Have you experienced any problems in developing new crematoria?

16. 34 out of 48 providers responded to the question. 35% (12 respondents) stated that they had experienced problems.
17. A number of providers noted the challenges in developing new crematoria. In particular, the lack of available or affordable land; a need for sufficiently large sites to make a development economically viable; legislation and guidance which effectively restricts development in Green Belt or other countryside with strict planning controls; and public opposition and/or local authorities seeking to protect existing council-owned facilities.

18. Some respondents highlighted the restrictions in the 1902 Cremation Act which prevent a crematorium from being located within 200 yards of any dwelling house (except with the consent of the owner) and 50 yards from a public highway. Others noted that guidance² worked against the requirements of the Act by recommending sites with sufficient land of at least two to four hectares and in a quiet location to allow peace and tranquillity. Several respondents suggested removing the restrictions in the 1902 Act and/or amending the guidance as modern cremation practices are less dangerous with less undesirable material released, meaning that distance from other buildings is not as important as previously.
19. Other respondents, however, were concerned that relaxing the restrictions would mean that more or smaller crematoria would be built where there was insufficient need leading to higher cremation fees because of underused provision. Memoria Ltd, for example, argued that it would be uneconomic to build crematoria that handle only around 500 cremations a year as the construction costs would remain the same and therefore the price of cremation would be forced up.
20. The Local Government Association highlighted the constraints for local authorities in terms of funding new crematoria:
- “cremation fees have to cover staffing, facilities and grounds maintenance, energy and equipment costs, as well as any investment in facilities or equipment. Any new crematoria would need to be paid for out of capital funding or borrowing by local authorities. Therefore any further requirements on these services are likely to have a direct impact on the costs of providing them. This is a concern, especially with the potential impact on funeral poverty”.* Local Government Association
21. Overall, despite the challenges, some respondents commented that the planning system remained fair allowing consideration of the relevant local and planning issues in determining whether a new crematorium should be built:

“we believe that the current guidelines are perfectly adequate and serve the nation well in balancing the needs of the bereaved and the lack of desire to have these facilities needlessly built next to communities who do not want them. Under the current guidelines there are less than ten new sites to build in England”. Memoria Ltd.

“we feel that, in most part, planning authorities consider our schemes carefully and fairly. In return, we appreciate that any developer should be mindful of the relevant planning policies for that area and only put forward well designed, carefully researched and selected proposals.” Westerleigh Group Ltd.

Conclusions and response

22. Responses indicated that concerns about access to crematoria were largely concentrated in a limited number of areas, which is consistent with information from providers that there are a small number of areas that require additional provision. Although concerns were raised about waiting for an available slot (discussed in the next section), we did not see evidence of a national shortage of crematoria buildings.

² Department of the Environment, 1978, The Siting and Planning of Crematoria or equivalent industry guidance

Information was provided to the contrary in that new crematoria are being developed which is taking the pressure off existing sites.

23. We recognise that there are challenges in developing crematoria, which arise from the size and scale of development that is normally required. We consider that the restrictions in the 1902 Cremation Act remain appropriate to protect neighbouring dwellings and the sanctity of memorial grounds. However, we recognise that additional restrictions are contained in guidance, and we will therefore consult on revised guidance which could allow smaller sites to be developed, particularly if there is not an accompanying burial ground or need for space to scatter ashes. Developers will, however, still need to be sure of the economic viability of a site.
24. The Government has no plans to reduce the protections in national planning policy for the Green Belt. These ask local planning authorities to regard a new crematorium as inappropriate development on Green Belt land, needing very special circumstances to justify planning permission. Other protections will continue to apply in other countryside and designated land such as National Parks.
25. We continue to believe that local authorities are best placed to consider the need for new crematoria in their area and to consider the facts and circumstances of individual applications. We will bring this response to the attention of local authorities in areas where respondents felt a new crematorium is needed. We were informed that new crematoria have been developed in Hertfordshire and Leicester, both of which opened in 2017 which may respond to demand in these areas.
26. As part of our informal evidence gathering, we heard some examples of community groups or individuals who were interested in developing not-for-profit crematoria to address concerns. The Ministry of Housing, Communities and Local Government funds the My Community service to provide advice to community groups on neighbourhood planning and community-owned assets, and can provide guidance on ways to support potential interest in crematoria services.

Size and Capacity of Crematoria

27. We asked a number of questions about the size and capacity of crematoria to assess concerns about accommodating large groups of mourners, as well as the availability of service times.

28. Views were invited on the following questions:

Q12-13 Have you experienced any problems with the size of crematoria to meet the needs of your faith or community?

29. 73 out of 103 faith or other community groups responded to the question. 71% (52 respondents) reported that they had experienced problems.

30. Most respondents highlighted that crematoria struggle to accommodate the large numbers of mourners present at Hindu, Sikh and Jain funerals. However, concerns about space were not just restricted to the areas of high Hindu, Sikh and Jain populations who responded to questions on access to crematoria; one Sikh respondent highlighted similar concerns at crematoria in Yorkshire and the North East.

31. Most responses highlighted that crematoria chapels or funeral halls were too small. For example:

"very often the capacity at local crematoria is unable to cope with the number of mourners which results in people having to stand outside the main hall". Respondent, Leicester

"on average there are more than 300 people at a traditional funeral event who attend the cremation ceremony and many more for the prayer meeting before and after the cremation. There are no large chapel halls to accommodate these numbers. The Crematoria in the London Borough of Barnet which are the nearest facilities struggle to accommodate everyone; people have to stand outside in all weather". Institute of Jainology on behalf of all Jain Organisations in London.

32. Respondents also highlighted difficulties with space before and after the funeral service. For example:

"the difficulties encountered are around a lack of a large enough waiting room space for mourners to gather before the service. This affects all those attending cremation services, not just those with specific religious or cultural requirements." Cruse Bereavement Care

"most sat in their car and took turns to meet host mourners once the funeral ceremony was over. Those who attended the ceremony were asked to leave so those waiting in cars could meet the family of mourners." Respondent, Surrey.

33. However, one respondent pointed out that large funerals are not commonplace with concerns about expanding chapels or funeral halls:

"while there are often large and very large funerals to conduct, and I entirely support the need for particular cultural or faith groups, I am often in the unhappy situation of conducting a funeral with perhaps six mourners in a 'chapel' that accommodates over 100. So while I entirely understand the need for some larger venues, I would appeal

for sensitivity that the vast majority are below 50, and many below 20, and it is soul-destroying to feel lost in such a vast space. So please do the 'cinema' thing and make sure there are varied sizes. The cost of one small chapel would be a minor cost within a large development, which most new ones will be". Respondent, Sheffield.

Q14-15 Have you experienced any problems with booking the time or length of cremation services to meet the needs of your faith or community?

34. 66 out of 103 faith or other community groups responded to the question. 64% (43 respondents) reported that they had experienced problems.

35. Most respondents highlighted difficulties in obtaining a suitable service time slot, particularly at peak times, which impacted on the requirements of their faith and meant they had to travel further. Waiting times of between two and ten days were commonly cited, with one user saying that funeral directors frequently reported waits of four weeks in South East London. For example:

"the nearest crematorium is nearly 10 miles away and [we] often have to wait a week to get a place. Hindus prefer to do the ceremony at crematorium within 3 days of death". Respondent, Leicestershire.

"to obtain slot for cremation one has to wait 48 hours to 72 hours and there are not many suitable crematoriums to accommodate friends and family". Lohana Community West London & L M (UK) Trust.

36. Issues were also highlighted with the availability, and costs, of services at weekends or over a Bank Holiday. For example:

"I wanted to cremate my father, [and] we want[ed] [to] cremate him on a Saturday. Both Leicester and Loughborough refused on [the] grounds [that it was a]...Bank holiday weekend [and] they will not be [able to] accommodate [us]. We had no choice [but] to cremate him in Nottingham." Respondent, Leicester.

"the main problem is the cost of crematorium services which are nearly £800 and almost £1200 at the weekend or 50% higher than [a] weekday. These seem excessively high." Respondent, Leicester.

37. Other respondents said that there is insufficient time allowed for the service or to administer the last rites, prayers or other rituals such as hand-washing after the cremation. To allow for longer funeral services, respondents from the Hindu, Sikh and Jain faiths reported that they often book two service slots but that this increased the costs.

"45 minutes slots can sometimes restrict the ability to carry out all the prayers and services". Respondent, Leicester.

"[there is] queuing when the previous funeral runs late. The time slots are too short at 45 minutes. A conveyer belt comes to mind." Respondent, Croydon.

38. Other responses highlighted delays in getting the death certificate, short opening hours of the registrar's office and difficulties in getting the necessary paperwork to the funeral director. These issues are outside the scope of this review.

39. One respondent reported a delay in the availability of their loved one's ashes after the cremation, which led to a suspicion that they may have received the wrong ashes. Options for the disposal of ashes, and associated record-keeping, were considered as part of the Ministry of Justice consultation on cremation legislation and practice. The Government published its response to this on 7 July 2016.

Q16-17 Have you experienced any problems in accommodating larger groups of mourners?

40. 37 out of 48 providers responded to this question. 54% (20 respondents) reported problems in accommodating larger groups.

41. Respondents acknowledged issues with chapels or funeral halls being too small, particularly for Hindu, Sikh and Jain funerals and if the ceremony is for a young person or someone who was well known in the community. Dignity Funerals Ltd survey of its own crematoria found that in 165 of 276 Hindu or Sikh services, the chapel was considered too small. The National Association of Local Councils said that it was likely that parishes would only have small to medium-sized facilities so large groups may cause some issues.

42. A number of local authorities reported problems with accommodating large groups. For instance, Wakefield Council said that they are sometimes unable to accommodate all the mourners in the chapel, with many having to wait outside without cover. Sefton Council, typical of many, noted that they have two crematoriums that have a capacity of 80 and 100 respectively and that it is challenging to accommodate larger groups than this.

43. Some respondents noted that when crematoria accommodate large groups, this sometimes puts pressures on public roads and the surrounding areas.

44. However, providers also noted that the majority of cremation services do not exceed 100 people and therefore in most cases, the size of the chapel or funeral hall is adequate. Leicester City Council pointed out that most of the services are attended by fewer than 30 people and that larger chapels may make small gatherings feel uncomfortable. Providers were also concerned about the costs of accommodating large groups. The Federation of Burial and Cremation Authorities estimated that to accommodate groups of around 300 mourners would double construction costs meaning that sites would not be economically viable.

Q18-19 Have you experienced any problems in booking the time or length of cremation services to meet the needs of mourners?

45. 38 out of 48 providers responded to this question. 24% (9 respondents) reported problems.

46. Respondents acknowledged that there is a higher demand for services between the core hours of 10:30am and 3:30pm but that there is capacity at other times. For example:

“Empirical evidence for the Kent & Sussex Crematorium over the last five years [indicated] significant family preference for service times between 10am and 3pm

throughout the year and periods of local high death rates (traditionally though not exclusively winter) as the primary driver. This is despite the continued availability of early and late daily service times at lower cost that continues to exist". Tunbridge Wells Borough Council.

47. Respondents also highlighted increasingly longer service times. The Association of Private Crematoria and Cemeteries highlighted data from the Cremation Society of Great Britain showing that in 2007, 42% of all cremation appointment times were for 30 minutes but by 2014 this had reduced to 20.4%. Similarly, in 2007, 30.4% were of 45 minute duration, but by 2014 this had risen to 40.7%:

"gradually, crematoria are reacting to the belief that the 30-40 minute window offered to the bereaved is no longer fit for purpose" National Association of Funeral Directors.

"we would hope to see the funeral service intervals set at around 45 minutes, giving the mourners a much more appropriate time during which to say farewell to a loved one." Federation of Burial and Cremation Authorities.

48. The Federation of Burial Cremation Authorities added that the requirements of some faiths, for example, the time taken by mourners to wash and view the charging of the coffin into the cremator, adds to the total service and turnaround time. This reduces service availability and is likely to have a significant impact upon the other users of the facilities.

49. Some respondents highlighted that the popularity of peak slots was in part due to the schedules and capacity of funeral directors, and that problems arose because of a lack of information provided to the crematoria. This means that the crematoria do not book a double slot and are unable to provide extra cover to manage parking. For example:

"when young people/large attendances are expected or large content services are booked we urge the organiser to book a double time so this allows it to not infringe on the service following." Salisbury City Council.

"...some funeral arrangers do not always advise families about the length of services required if, for example, the deceased is young, died under tragic circumstances, is well known or highly respected within the community etc. We have found that in these type of circumstances larger numbers attend". South West Middlesex Crematorium Board.

50. We also noted the lack of information on slot availability (and indeed other services) available directly to bereaved families. One respondent added:

"the single thing that would have made the biggest difference to my family at a very difficult time would have been clear information on local facilities available either on a dedicated website or on London Borough of Harrow website on how to directly organise a personalised cremation for a family member". Hindu Respondent, Harrow, North-West London.

51. This is endorsed by YouGov research in collaboration with Cruse Bereavement Care and the National Association of Funeral Directors which found that 85% of adults surveyed who had organised a funeral in the past five years wanted better access to information online.

Q20 If you have adapted your facilities or services to meet the needs of larger groups of mourners, how did you do this and why?

52. The majority of providers indicated that they have provided adaptations to meet the needs of large groups of mourners. Many providers offered additional space outside the main chapel, such as a foyer or courtyard, along with an outside sound system or large monitoring screens. For example:

“we have provided external speakers, so that mourners outside can hear [the] service; TV monitors [are] provided in waiting rooms so that [the] service can be streamed into these areas. [We also] provide lower cost options at off peak times (early morning 9:00 - 10:00) to increase uptake”. Wakefield Council

“we provide a separate viewing room linked by CCTV for larger numbers. Our crematorium has been remodelled to provide additional seating capacity in side chapel viewing rooms linked to the main chapels by CCTV” Leicester City Council

Conclusions and response

53. Responses indicated that the size of chapels, which are mainly built to accommodate up to 100 mourners, meant that there was a clear problem in accommodating large groups. This impacts particularly on the Hindu, Sikh and Jain faiths, but can also affect the funerals of young people or where the person has died in tragic circumstances or is well-known in the community. Whilst appreciating that the majority of providers have adapted their facilities, and that the average size of funerals is around 30 people, we can understand the frustration from particular communities at a lack of facilities that are able to accommodate sufficient numbers of mourners within the chapel or prayer hall. We can also appreciate the concerns from providers about the costs of building larger chapels, or difficulties in expanding facilities because of the constraints of existing sites.

54. The Department of Environment 1978 guidance on the Siting and Planning of Crematoria recommends that accommodation should be limited to a maximum of 80 persons. We consider that this no longer meets the needs of communities in England, particularly with a growing and more ethnically diverse population. Industry guidance recommends chapels should accommodate up to 100 mourners and is more up-to-date. We also consider that needs assessments should enable the crematoria design to take into account local demand for larger funeral sizes where these are more common. We also welcome the suggestion made by one respondent that chapels should be more flexible, allowing smaller and larger chapels to be combined assuming that appropriate sound-proofing can be provided. We will therefore consult on revised guidance which allows for larger chapels and foyers to accommodate greater numbers of mourners.

55. Although many respondents indicated difficulties in accessing service times, we heard clear evidence of capacity outside peak times, particularly mornings or late afternoons. We also heard evidence from private providers that they are adapting to demands, for example, with Saturday services and lower cost funerals for services outside of peak periods. We encourage industry providers to be

transparent about the services they offer so that the families of the bereaved can make informed choices.

Crematoria Facilities – Accommodation and Amenities

56. We asked a number of questions to understand whether crematoria were providing facilities and accommodation that met the particular cultural or religious needs of faith or other community groups.

57. Views were invited on the following questions:

Q21-22 Have you experienced any problems with crematoria accommodation or amenities to meet the needs of your faith or community?

58. 72 out of 103 faith or other community groups responded to this question. 65% (47 respondents) reported that they had experienced problems.

59. Respondents from several groups, including Pagan, Sikh and Hindu faiths, highlighted the problem of a lack of space separate from the main chapel or service hall. Most respondents required a space for prayer or rituals, along with handwashing facilities for Sikh, Hindu and Jain funerals, while a small number requested rooms for other purposes such as to meet with family and friends or to change into sacred robes. In the absence of suitable facilities, respondents conducted prayers or rituals outside which can be a particular challenge in poor weather, or rented external venues such as community halls.

“on a regular basis the last rites before the cremations have taken place at the Funeral Directors premises which is stressful. We urgently need a large Prayer Hall or Chapel near the Crematorium. This will allow the last rites to be performed and the body ready for cremation. This will also accommodate close relatives and friends to witness and pay their respects to departed soul. There should be provision for washing the bodies, dressing and the last rites performed before any cremations”. Federation of Hindu and Jain Communities Leicestershire.

“immediate prayer rituals that are needed to be undertaken after the coffin has been placed within the furnace can only be undertaken once the congregation have washed their hand and faces – this cannot be undertaken because of the lack of hand washing” Sikh Respondent, Keighley, West Yorkshire

60. The facility to witness the charging of the coffin was also raised a number of times and it is of particular importance to Hindu and Sikh groups. The ability to view the charging of the coffin, and how many people could witness the event, varied between crematoria. Whilst a small number of respondents had used crematoria with purpose-built viewing facilities for a large number of mourners, it was more common for respondents to have used a crematorium enabling just a small number of individuals to directly witness the coffin entering the cremator. Some respondents appreciated the use of cameras so that mourners in another room could witness the charging.

61. Some Sikh and Hindu respondents also noted the absence of running water from many crematoria sites in which to scatter ashes. Respondents suggested that information on nearby rivers or streams where it would be possible to scatter ashes would be helpful in order to facilitate this.

“many families take the ashes back to India but more and more scatter them in running water here. It would be helpful to have greater awareness of where this can be done”.
City Sikhs

62. Pagan respondents highlighted issues with the layout of the chapel or service hall, in particular fixed seating which prevented people sitting in a circle, and the lack of ability to conduct the service outside.

63. Some respondents also raised concerns about the lack of facilities for elderly or disabled people, including the distance to car parking and the availability of seating when there were large groups of mourners.

64. Respondents were positive about crematoria that were able to accommodate their needs through extra space on-site, whilst others highlighted that funeral directors were able to assist them in finding a suitable alternative location to perform last rites and prayers:

“the crematoriums that I have attended have sufficient facilities for Sikhs. A good example of one that works well is the West Bromwich crematorium in Birmingham”.
City Sikhs

65. Overall, respondents suggested a need to modernise crematoria in order for them to be more accessible. For example:

“north London has been mentioned as an area where there are some ageing crematoria which are restricted in their facilities.” The Mission and Public Affairs Council of the Archbishops’ Council of the Church of England.

Q23- 24 Do you provide specific accommodation or amenities that meet the needs of faith or community groups, such as a private room to mourn with the coffin, washing facilities, or an ability to witness the coffin entering the cremator?

66. 40 out of 48 providers responded to the question. A number of respondents suggested that as faith or community groups were a very small minority of cremations, specific accommodation or amenities were not provided. However, most responded by saying that they try to be as flexible as possible to cater for the individual needs of mourners, for example by offering a smaller group of mourners to view the coffin and to witness the coffin enter the cremator.

Q25 If you have increased your provision of accommodation or amenities to meet the needs of faith or community groups, how did you do this and why?

67. 43 out of 48 providers responded to the question. 93% offered specific services to meet the needs of faith or community groups (40 respondents).

68. A number of respondents reported adapting their facilities following consultation with local faith group on their needs. Some made changes as part of wider modernisation, for example adding a viewing room to witness the charging of the coffin when a new cremator was installed. Others had used technology, such as loud speaker systems and screens to broadcast part of the service or the charging of the coffin, to other rooms.

69. Additional services were offered by some crematoria including through a partnership approach with other sites. Brighton and Hove City Council, for

example, noted that although they did not have the facilities, they were able to offer the use of a private room for mourning on another site within the cemetery and washing facilities at a nearby cemetery with prior notice. Similarly, Leicester City Council reported providing off-site facilities on a separate location for scattering ashes in flowing water which had proven popular with mourners of both faith and non-faith:

“while we do not offer an area at the crematorium for scattering on water we have established a riverside platform at a quiet location on the nearby River Soar to allow families to scatter ashes on the river. The river scattering facility is promoted via signage at the crematorium, leaflets and on the web.” Leicester City Council

70. There was some evidence of private providers developing new facilities in order to appeal to specific local populations. For example, a new crematorium in South Leicestershire which allows witnessing of the charging of the coffin from the main chapel or service hall, washing facilities and removable iconography.

71. Reasons cited by the respondents who have not adapted their facilities included a difficulty in adapting old crematoria and the additional costs which were considered to be unjustified given a lack of demand for such provision in their area. For example:

“ this is only really an issue where there are large Hindu or Sikh populations. The vast majority of English crematoria are never asked to receive an Asian faith service. Nevertheless, all should be prepared to”. Memoria Ltd.

Conclusions and response

72. Responses indicated that the constraints of ageing facilities, a lack of space and the costs of adaptations had limited the ability of crematoria to fully meet the needs of different faith and community groups. Whilst appreciating that needs will vary across the country and that in some areas demand will be low, we do not accept the argument that specific facilities are unjustified if used only several times a year. Crematoria, like other public buildings, should be able to be utilised by all members of the community. We heard examples of good practice where providers were able to accommodate needs at other sites, if not their own. We remind local authorities of their duties under the Equality Act 2010 to avoid discrimination, and more broadly, we encourage all crematoria to work closely with their local communities in ensuring that their facilities meet specific needs.

73. There is little mention of the requirements of different faith or community groups, or to consult local communities on these aspects, in the Department of Environment 1978 guidance on the Siting and Planning of Crematoria. We will consult on revised guidance which encourages the needs of different faith or community groups to be taken into account when planning crematoria.

74. Some respondents noted the desire to cremate through the use of open funeral pyres rather than cremators. The Court of Appeal judgment in the case of Ghai vs Newcastle City Council and the Secretary of State for Justice, ruled in Mr Ghai's favour on the issue of funeral pyres, determining that it is possible to have a crematorium which has an open-air part to its structure (meaning that cultural practices can be accommodated). The judgment therefore concluded that it was

possible to meet both Mr Ghai's religious and current regulatory requirements by conducting a cremation within the scope of existing cremation law. However, regulatory issues such as planning permission, clean air and anti-pollution laws and obtaining any relevant licences, would still need to be considered.

Crematoria Facilities – Iconography

75. We asked a number of questions to understand whether crematoria were providing iconography to meet the needs of faith or other community groups.

76. Views were invited on the following questions:

Q26-27 Have you experienced any problems with crematoria iconography to meet the needs of your faith or community?

77. 64 out of 103 faith or other community groups responded to the question. 48% (31 respondents) reported that they had experienced problems.

78. A number of respondents highlighted that iconography, or other materials such as prayer books or music, were not provided to meet the needs of their faith or belief. Many respondents commented that the design of crematoria remained overwhelmingly Christian in ethos, for example pews for seating.

79. However, this was balanced with a number of respondents raising concerns about the removal of Christian iconography. It is however important to note that England has an established Church, and the status of the Church of England is protected in law.

“it is common for Christian celebrants to arrive and find no Christian iconography in place at all, since it will only be provided in response to a specific request. That area suggests, reasonably, that the usual iconography – a Cross etc – should routinely be in place for Church of England funerals”. Mission and Public Affairs Council of Archbishops' Council of the Church of England.

“most people in the UK are Christian so [it] seems inappropriate to change iconography. Temporary removal would be fine but not permanent”. Christian Respondent, Surrey.

Q28-29 Do you provide removable iconography to meet the needs of faith or community groups?

80. 39 out of 48 providers responded. The majority of respondents said that they provide removable iconography to meet the needs of faith or community groups. Canley Crematorium in Coventry has available the Hindu Aum (Om), the Sikh Ek Onkar and a statue of the Hindu deity Shiva.

81. Kent and Sussex crematorium, for example has a removable crucifix, and although Hindu cremations make up a tiny fraction of total cremations, when they have been held, Hindu groups have either provided their own iconography or have asked for the crematorium chapel to be made neutral.

82. The Federation of Hindus and Jains in Leicestershire has provided guidance to local authorities in their area on the use of iconography.

83. However, the National Secular Society responded by saying that *“all civic crematoria are religiously neutral spaces by default. Crematoria should provide a range of religious iconography and inform users in advance that these are available upon prior request”*.

Q30 If you have increased your provision of iconography to meet the needs of faith or community groups, how did you do this and why?

84. 40 out of 48 providers responded to this question. 90% (36 respondents) indicated that they provided removable iconography.

85. The majority of providers indicated that they offered iconography to meet the specific needs of faith or community groups, which was becomingly increasingly common to reflect changing populations within the catchments of individual crematoria as well as a decline in religious funerals. For instance:

“all of the chapels are non-denominational and all religious symbols are available for display and are interchangeable to accommodate all beliefs and ideals”. South West Middlesex Crematorium.

“we provide [a] cross that can be covered when requested at both Wakefield and Pontefract Crematoria. [The] cross [is] uncovered for about 30% services”. Wakefield Council

86. Many local authorities offer local faith groups the opportunity to provide their own iconography. For example:

“[we] have forwarded the opportunity for local community groups to supply the Deity which we store in a glass cabinet until such times as it is required and also the provision of storage for the religious books (again supplied by local community temples)”. Coventry City Council.

87. Some providers were utilising modern technology, for example, a projector system to reflect religious icons or show other personalised videos within the chapel or service hall. For example:

“Christian, Sikh and Hindu icons are provided along with a projector system allowing communities to project any symbols or videos on to the chapel wall. In addition we provide a range of religious specific music”. Sandwell Metropolitan Borough Council

Conclusions and response

88. Crematoria should ensure that their facilities are suitable to meet the needs of all members of the community, including those from all faiths and none. As part of this, we encourage the provision of interchangeable iconography, and will consult on revised guidance that supports this.

89. We understand that some local authorities ask faith groups to provide their own iconography, prayer books or music, seemingly because of restrictions on the use of public funding for activities of a religious nature. This appears to be in contrast to private providers, or at least those with more modern facilities, and may add to a sense of frustration amongst minority faiths. The Government will write to all

local authorities to confirm that there are no restrictions on local government revenue spending which would prevent public funding being used for such items. Therefore, funding of iconography or materials in a public building should not be affected. The Local Government (Religious etc. Observances) Act 2015 makes clear that a local authority in England may support or facilitate a religious event, or an event associated with a religious or philosophical belief.

Crematoria Facilities – Car Parking

90. We asked a number of questions to ascertain whether the capacity of crematoria and pressure for longer services or larger groups of mourners was creating difficulties with car parking.

91. Views were invited on the following questions:

Q31-32 Have you experienced any problems with car parking at a crematorium to meet the needs of your faith or community?

92. 64 out of 103 faith or other community groups responded to the question. 63% (40 respondents) reported that they had experienced problems with car parking.

93. Respondents, notably from Hindu and Jain groups, cited car parking facilities as a problem due to the large number of mourners. Some respondents highlighted that particular problems arose when the previous group of mourners were slow to leave the premises, and that disabled and elderly mourners are particular disadvantaged by a shortage of parking facilities. For example:

“[There is] insufficient space for [the] number of vehicles. If [the] previous funeral party is large and slow to vacate, then even crematoria with big car parks (and overspill space) can be very difficult to find parking in”. Respondent, Huddersfield.

“There is often not enough parking. It is an out of town crematoria, and once the two small car parks are full you have to park on the garden roads, making access for older people more difficult”. Respondent, Sheffield.

94. One respondent said that families sometimes opted to hire coaches to ensure all attendees can attend the service and to ease the problems around parking:

“this has always been the case – not enough space. Members of the community are aware of the situation and the immediate family try and accommodate the crematoria rules by hiring a coach/es to ensure all individuals who want to attend can do so”. Sikh Respondent, Keighley, West Yorkshire.

Q33-34 Have you experienced any problems with car parking at crematoria to meet the needs of mourners?

95. 40 out of 48 providers responded to this question. The majority of responses said they did not generally have problems with car parking, though one response referred to poor and inconsiderate parking.

96. Mercia Crematoria Developments referred to the desire of *Highways Authorities to increase parking in order to ensure that there are no tailbacks on to public*

highways. They are somewhat reassured when service intervals are long enough to enable the full departure of one service before the arrival of the next.

Q35 If you have increased your car parking availability, how did you do this and why?

97. 42 out of 48 providers responded to this question. 79% (33 providers) reported that they had experienced problems with car parking.

98. Respondents highlighted pressures on car parking facilities, mostly because of increased car ownership or reliance on car travel, but also when there were large groups of mourners. For example, a survey by Dignity Funerals Ltd of its own crematoria found that in 186 of its 276 Hindu or Sikh cremation services, the car park was too small.

99. Many respondents had extended parking capacity or put in place overflow provisions where feasible, as well as extending service time or encouraging use of private hire buses to alleviate problems. This was achieved by a number of means including applying for planning permission on nearby land or leasing additional land. Some providers indicated that the costs, a lack of space or planning restrictions made it more difficult to expand parking facilities. For example:

“overspill parking on driveways or hardstanding areas have frequently been included as part of the original planning application. In addition, members have extended parking capacity wherever the site geography allows them to do so”. Association of Private Crematoria and Cemeteries.

“an ‘overflow’ provision was established immediately adjacent to the existing car park and crematorium approximately ten years ago in response to capacity issues”. Tunbridge Wells Borough Council.

Conclusions and response

100. Responses indicated that car parking was a problem for both users and providers, and not just for groups who are likely to have large numbers of mourners. Existing guidance indicates that the size of the car park should be governed by the capacity of the chapel. The Government continues to believe this is the right approach, though one that will always require approval of the local planning authority. We are not convinced by the argument made by some that people are more likely to drive to a crematorium than to other public buildings located on the edge of a town or city, such as hospitals. We do, however, recognise the increasing use of overspill facilities and coach parking and will consult on revised guidance that considers the impact of these changes.

Crematoria Facilities – Staff Training

101. We asked a number of questions to understand whether staff training pays sufficient regard to the cultural sensitivities of different faiths and other community groups.

102. Views were invited on the following questions:

Q36-37 Have you experienced any problems with crematoria staff's awareness and sensitivity to different faith and community groups?

103. 58 out of 103 faith or community groups responded to the question. Responses ranged from Durham County Council who said that they offered staff training and that their equality and diversity training was mandatory, to a recommendation by the Federation of Hindu and Jain Communities in Leicestershire for annual training for staff, which would include input from relevant faith groups.

Q38 What more do you think needs to be done to improve the awareness and sensitivity of crematoria staff to different faith and community groups? Who should do this?

104. 58 out of 103 faith or other community groups responded to this question. 31% (18 respondents) said that they had experienced problems with staff awareness.

105. Respondents highlighted examples where they felt that staff – working for either funeral directors or the crematorium – were insensitive to their faith or not knowledgeable about certain aspects. For example, placing the coffin incorrectly within the chapel or service hall, lacking care when transporting the coffin which can cause turbans to slip, causing distress to mourners when opening the coffin for a last viewing or religious symbols being placed the wrong way round. In particular Hindu respondents highlighted that staff were generally not aware of the rituals or traditions that are carried out before cremation, and Pagan respondents reported a lack of understanding of their beliefs and terminology:

“[there is] no awareness of paganism. Requests [are made] for the name of the 'priest' (many pagans are non-hierarchical and most often groups are female led) conducting the service. [There is an] incorrect association with Satanism” Pagan Respondent, Leeds.

106. Respondents highlighted the need for better channels of communication between cremation representative bodies, crematorium managers, funeral directors, clergy and celebrants and those groups representative of mourners. Community representative groups offered to help input to materials or training. For example, that the Pagan Federation could create an online resource to help train crematoria staff. More broadly, it was noted that it is essential that all those who work in crematoria who come into contact with bereaved people have training in understanding the needs of those who are bereaved.

Q39-40 Does your staff training policy include cultural awareness and sensitivity to all faiths, community groups and users?

107. 37 out of 48 providers responded to this question. 84% (31 respondents) offer staff training on cultural awareness.

Q41- 42 Have you received any complaints regarding the awareness and sensitivity of crematoria staff to different faith and community groups?

108. 27 out of 48 providers responded to this question. 1 provider indicated they had received a complaint(s) regarding the cultural awareness of staff. The Association of Private Crematoria and Cemeteries explained that few complaints are believed to have been received by their members but that this may be, in part, because mourners have more direct and intense contact with funeral directors as compared to crematorium staff.

109. The majority of providers offer some form of staff training which includes cultural awareness and sensitivity as well as equality and diversity training. For example, Co-Op Funeralcare's in-house training covers 12 different faith groups and 14 cultural groups. In a number of cases, training is mandatory for all staff. We also heard evidence from larger private providers who employ specialist faith consultants to advise on practices, and from crematoria who hold open-days to offer members of the public a tour of the facilities.

110. The Local Government Association additionally highlighted good practice in terms of dialogue with communities and funeral directors about the provision of bereavement services. This included open days and community leaders being encouraged to share information directly with council officers.

Conclusions and response

111. We appreciate that some of the reported concerns may relate to different interpretations of faith and belief practices and that there can be a lack of consensus on such matters, even within a single faith. Nonetheless, crematoria providers should clearly be able to demonstrate sufficient understanding of faith and other community groups' requirements to be able to provide an appropriate service. Some of the examples of training or guidance that were referred to appeared to focus more on equality and diversity rather than be comprehensive guidance for all crematoria staff on faith and belief practices.

112. We have discussed the importance of staff training and engagement with providers and representative bodies, and will consider further working with members of the National Cremation Working Group which the Ministry of Justice has set up to provide expert input into infant cremation legislation and practice. As highlighted previously, we also encourage all crematoria to work closely with their local communities to ensure their facilities meet specific local traditions and to be transparent about the services they offer so that the families of the bereaved can make informed choices. We also support any efforts by the industry to improve the diversity of staff which may help to improve awareness and engagement with particular communities.

Consultation principles

The principles that Government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<https://www.gov.uk/government/publications/consultation-principles-guidance>

Annex A – List of respondents

Below is a list of all those respondents that responded as an organisation:

- ASHRAM
- Association of Private Crematoria and Cemeteries
- Barnsley Metropolitan Borough Council
- Blackburn with Darwen Borough Council
- Blackpool Council
- Board of Representatives of Bradford Gurdwara's
- Boston Borough Council
- Brighton and Hove City Council
- Chilterns Crematorium Joint Committee (Local Authority)
- Churches' Legislation Advisory Service
- CIEH Food Safety Training Centre
- City of Bradford Metropolitan District Council
- City Sikhs
- Co-Funeralcare
- Coventry City Council
- Cruse Bereavement Care
- Dignity Funerals Limited
- Durham County Council - Durham Crematorium
- Durham County Council - Mountsett Crematorium
- Eltham Crematorium Royal Borough of Greenwich
- Federation of Burial and Cremation Authorities
- Federation of Hindu and Jain Communities Leicestershire
- Funeral conductor for Hindu community
- Hartlepool Borough Council
- Hindu Community Centre
- Hindu Forum of Britain
- Historic England
- Holy Trinity Lamorbey Church of England Parish
- Institute of Jainology
- Ipswich Crematorium
- Iskcon UK, DMMofUK, HFB, Nanak Darbar N11
- Jain Organisations in the UK
- Kashmiri Pandit Cultural Society UK
- Kettering Borough Council
- Leicester City Council
- Leicester Progressive Jewish Congregation
- Liberal Judaism
- Local Government Association
- Lohana Community West London and L M (UK) Trust
- London Borough of Lewisham
- Medway Bereavement Services (Medway Council)
- Memoria Ltd.
- Mercia Crematoria Developments Ltd

- Milton Keynes Council (Environmental Health)
- Mission and Public Affairs Council of the Archbishops' Council of the Church of England
- Mountsett Crematorium
- National Association of Funeral Directors (NAFD)
- National Association of Local Councils (NALC)
- National Congress of Gujarati Organisation (NCGO) Uk
- National Council of Hindu Temples (UK)
- National Secular Society
- North East Surrey Crematorium
- North Tyneside Council
- Nottingham and Bristol Secular Societies
- Oldham Council
- Pershore Town Council
- Plymouth City Council - Cremation Authority
- Police Pagan Association
- Portchester Crematorium
- Putney Vale Crematorium (Wandsworth Council)
- Rajabodh Hindu Think Tank and Strategic Management Training Institute
- Reading Borough Council
- Salisbury City Council
- Sandwell Metropolitan Borough Council
- Sefton Council
- Shantidham
- Shree Jansari Gnati Mandal Leicester
- Shree Ram Mandir Hindu Cultural & Heritage Centre Ltd
- South West Middlesex Crematorium Board (board made up of elected councillors from 5 councils, Hounslow, Ealing, Richmond, Hillingdon and Spelthorne)
- Sri BARDAI BRAHMIN Samaj (Leicester) UK
- Sri Guru Singh Sabha Southall
- St Helens Council Crematorium
- Swaminarayan World Organisation (UK)
- The Churches Funerals Group.
- Tunbridge Wells Borough Council (Kent and Sussex Crematorium)
- Wakefield Council
- Walsall Metropolitan Borough Council (Willenhall Lawn Cemetery)
- Wellingborough District Hindu Association
- Westerleigh Group Ltd
- Willenhall lawn Cemetery/ Walsall Council



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