

The London Plan Examination In Public 2018 – 2019

Participant Written Statement

Brethren's Gospel Trusts

Reference ID: 2787

Matter M57 – Burial Space

Burial Space

M57. Would Policy S7 provide an effective and justified approach to the provision and reuse of burial space in London? In particular:

- a) Would Policy S7 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?*
- b) Would it provide an appropriate strategic approach to guide London boroughs in developing a cross borough approach to this matter?*

Introduction

1. Brethren's Gospel Trusts (BGT) welcomes the opportunity to participate in Matter M57 in this Examination. BGT represent ecclesiastical charitable trusts responsible for the provision and maintenance of Gospel Halls (Places of Worship) throughout England and Wales including several London Boroughs. The Plymouth Brethren Christian Church (PBCC) practices include burial of the deceased following scriptural principles¹. A number of gospel halls have associated private burial grounds. The burial ground currently in use for church members in the London area is located outside Greater London in Dartford Borough. However, PBCC members accept responsibility for the upkeep of graves and gravestones of deceased members buried in older public cemeteries within London boroughs. PBCC burials are generally undertaken in un-consecrated ground and provide for double or triple graves where ground conditions permit.
2. BGT objectives are to focus on:
 - the role of the voluntary sector in general and faith communities in particular in supporting the quality of life in London, in tackling social exclusion and inequalities, including crime and the fear of crime;
 - the need for a clear marker for Local Plan preparation in London of the need to promote truly sustainable communities and to encourage diversity and equality in planning;
 - the need to ensure provision at the London Plan level for the voluntary sector including faith communities and their need for space to operate and specifically to ensure the recognition of Places of Worship as part of the infrastructure for sustainable communities throughout London.

¹ Genesis chap15 v15; 23 v19 and chap 49 v31 – King James A.V.

3. BGT bring a non-sectarian faith perspective to the examination, recognising that there is a wide diversity of faith based communities within London.
4. The LGA have published guidance for local authorities² [NLP/AD/05] which includes a chapter 'Working with Faith Communities'. This includes the following advice at paragraph 8.2:

Faith is a key area for community cohesion for a number of reasons:

- *the traditions of all the major faiths contain teachings commending the fundamental values of equality and respect which are so important to community cohesion;*
- *the presence of communities of different faiths and cultures enriches an area;*
- *members of particular faith groups may have particular service needs;*
- *discrimination and prejudice on the basis of faith corrodes community cohesion and must be addressed;*
- *faith communities have much to offer their area as providers of services and as contributors to community cohesion projects; and*
- *harmonious co-existence of people of different faiths and beliefs is vital to community cohesion.*

Background

5. The issues around the capacity of existing cemeteries and provision of new burial facilities has exercised national and local government for an extended period as evidenced by:
 - *Burial Space needs in London* : LPAC January 1997 – Ref CON56: Halcrow Fox;
 - *Planning for Burial Space in London*: LPAC August 1997;
 - Select Committee for Environment, Transport and Regional Affairs Eighth Report : *Cemeteries* (2001)
 - *Burial Law and Policy in the 21st Century: the need for a sensitive and sustainable approach* – Home Office consultation paper January 2004;
 - *Cemeteries and their management* – Home Office online report 1/04 – January 2004;
 - *Reuse of Graves* – House of Commons Briefing paper Number 04060, 6 June 2017.
6. These issues as they relate to London appear to have been captured accurately in the background report: *An Audit of London Burial Provision (2011)* [NLP/SO/004].

The New London Plan – Policy S7

7. BGT did not comment on Policy S7 in their original representations, but are concerned that the needs of different faith groups continue to be respected in planning policies, particularly in local plans and neighbourhood plans. This is a sensitive subject, particularly in parts of London where future provision will need to be made either in an adjoining borough or beyond. This is recognised at

² Community Cohesion – an action guide: Local Government Association: 2004
<https://www.interfaith.org.uk/uploads/communitycohesionactionguide.pdf>

Policy S7 D and at paragraph 5.7.1 of the draft plan, where it is suggested that a sub-regional approach *may* be required.

8. It is noted that the evidence is that since WW2 the proportion of deaths resulting in cremation has risen from 4% to just over 71%³. Whilst this has enabled London authorities to eke out the land acquired and required for future burials, it is important to recognise that nearly 30% of deaths continue to result in a need for burials. Whilst several custom cemeteries are provided for Roman Catholic, Jewish and Muslim faiths, others will require the ongoing public provision.
9. It is noted that some existing cemeteries are protected as Green Belt, Metropolitan Open Land or other local designations (see for example LB Richmond on Thames). London Wildlife Trust draws attention to the broader aims for green infrastructure and the natural environment and the designation of many cemeteries and graveyards as Site of Importance for Nature Conservation, which is recognised in the supporting text to Policy S7.
10. The evidence available [NLP/SO/004] suggests that eight boroughs contain no significant burial space and a further fifteen are reliant on created graves or would be unable to meet projected demand for burial provision over the next twenty years. In such circumstances we submit that '*may*' in Policy S7 C ought to be replaced by '*will*'.

Conclusion

11. For all these reasons, we respectfully submit that subject to the above suggested revision, Policy S7 will provide an effective and justified approach to the provision and reuse of burial space in London.

³ *Planning for Burial Space in London*: LPAC August 1997