

CEMETERIES MANAGEMENT STRATEGY REVIEW 2007



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

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Gunnersbury Cemetery – the new car park and public lavatories were opened in the Summer 2006

1.0 Introduction

An internal audit carried out in 2005/06 into the Cemeteries section proposed that a review was now needed into our strategies for them. That review has been carried out by the Leisure Services Manager (Parks) in conjunction with the Cemeteries Manager and Cemeteries Assistant.

The Royal Borough believes that in addition to their primary function as somewhere to bury the dead, the cemeteries should be a place of peace, tranquillity for the public to visit, to pay respect to interred relatives and friends. Cemeteries must be protected from anti-social behaviour. As spaces that touch people at a particular poignant moment they need to be managed in a particularly sensitive manner.

This review of the Cemeteries has identified two major risks: diminishing space and diminishing income.

Part A of this report sets out the background to the Cemeteries, their location, history, maintenance and day to day management.

Part B of this report deals with the two major risks identified above.

Part C sets out other key issues that need to be considered.

Part D concludes the report with a number of recommendations.

PART A: BACKGROUND

2.0 Royal Borough of Kensington & Chelsea's Cemeteries

The Royal borough's two cemeteries are both located outside of the borough's boundaries: Hanwell, the earliest open, is located in Ealing on the Uxbridge Road (A4020) and Gunnersbury, is in the London Borough of Hounslow.

- Hanwell Cemetery was opened in 1855 and Gunnersbury in 1929.
- There are 78,145 internments recorded in Hanwell and 36,700 in Gunnersbury (1st December 2006).
- Hanwell covers 7.7 ha, while Gunnersbury covers 8.5 ha. Both are opened each day by 07:30 and closed at dusk through-out the year.
- Hanwell Cemetery is located on an area of surface gravel substrates that are relatively free draining and ideal for neutral grassland.
- Gunnersbury Cemetery is less well-drained and has a layer of fine top soil to a depth of 600 mm with a layer of clay beneath. This can make for extremely difficult digging particularly in the west of the cemetery.

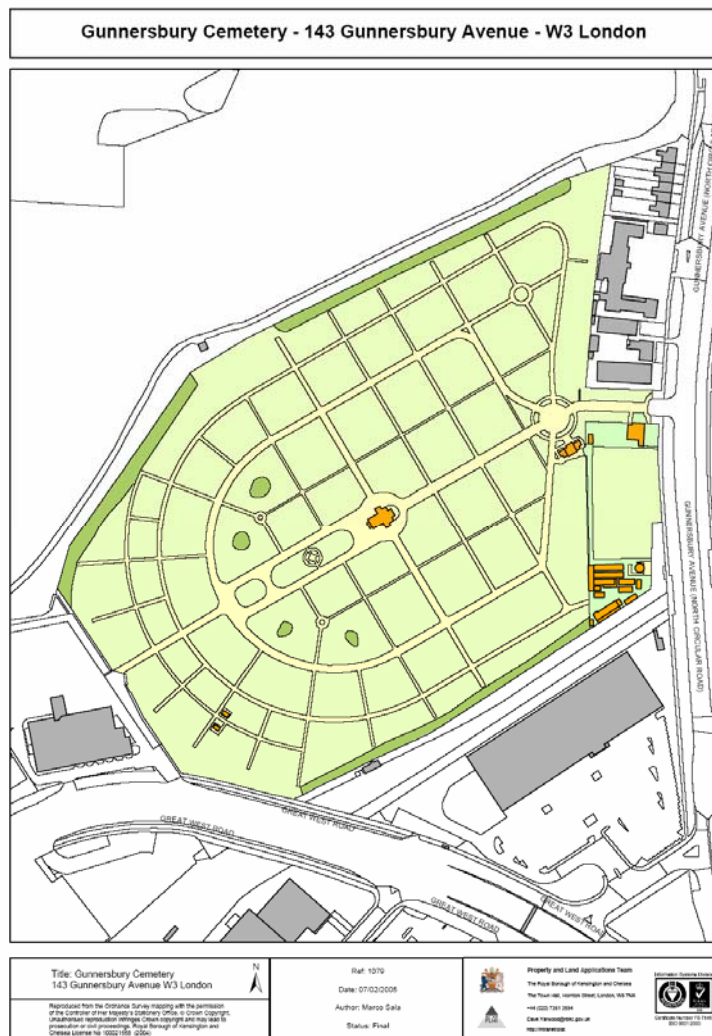


Memorials of note include:

HANWELL: William Whiteley – Founder of the Department Store; and Sir Frederick Watson – Master of the Household to Kings George IV, William IV and Queen Victoria.

GUNNERSBURY: the Katyn Memorial – designed by Louis Fitzgibbon and Count Stephan Zamoyski. This was dedicated in 1976 to the memory of the 14,600 Polish soldiers whose remains were discovered in a mass grave at Katyn, near Smolensk. The Polish Association arranges two remembrance days – in April to commemorate the massacre and in November for All Souls’ Day.

Others include: Lord Broughshane, a former Mayor of the Royal Borough; Sir Carol Reed – Film Director; and the Rev. Arthur Ingram – Royal Chaplin at Hampton Court.



3.0 Day to Day Cemetery Management and Maintenance

Reporting to the Leisure Services Manager (Parks) the service is directly managed by a Cemeteries Manager and Cemeteries Assistant – both based in Gunnersbury. The Grounds Maintenance is contracted to Quadron Services Limited which maintains a full-time presence in both cemeteries.

The Borough maintains all the buildings, paths, roads, site boundaries, drainage, water services and grass cutting, waste disposal and ground maintenance.

Annual stock condition surveys are undertaken of all buildings which the Authority control and form part of the Council's Asset Management plan and appropriate budgets.

Routine inspections are carried out of the paths, roads and immediate remedial measures are taken if hazards are identified such as tripping hazards, pot holes etc.

Both cemeteries are maintained to a high standard of grounds maintenance. Water supplies, WC's and garden waste disposal facilities are available in both cemeteries.

4.0 Principle Cemetery Buildings

HANWELL CEMETERY in the expected Victorian fashion is approached via an impressive arch constructed in 1855 and designed by Thomas Allom, Surveyor to the Ladbroke Estate in Kensington.

The Pseudo-Gothic style Chapel was consecrated on 13th October 1855. To the rear are catacombs that have been filled with old tombstones. In the 1890's stained glass, a mosaic dado, marble columns and painted roof as well as new piers were added. As the Cemetery no longer requires its own Chapel, the building is currently used only to store sets and other materials for the Holland Park Opera. The pews are now used in the Chapel in Gunnersbury Cemetery.

There are public lavatories and a small works yard with store rooms etc for the staff.

GUNNERSBURY CEMETERY dates only back to 1929 when the land was acquired from the neighbouring Rothschild Estate. Consequently the buildings are all Twentieth Century.

The brick built Chapel is used for services of all Christian denominations and some non-Christian faiths as well.

A new car park and adjoining public lavatory block was constructed in 2006.

The Cemetery Office is the administrative office of the service.

There are two staff houses: one in Gunnersbury occupied by the Cemeteries Manager and the other at the entrance to Hanwell Cemetery is currently occupied by the Parks Development Officer.

5.0 Rules and Regulations

The Cemetery Rules and Regulations (See Appendix Two) are an integral part of this strategy and basis for the management of the Cemeteries. They enable the public, funeral directors, memorial masons to understand the rules that the Authority require to be applied within the cemeteries. In addition, officers of the Authority apply these rules and regulations to ensure the cemeteries are managed and operated on a common sense, practical and sympathetic manner. They also enable consistency to be achieved.

The particular area covered within the rules and regulations include:

- a) General details
- b) Interment
- c) Requirements of Funeral Directors or Companies
- d) Monuments, memorials and vaults
- e) Conduct in Cemeteries
- f) Definitions

6.0 Health and Safety

Health and Safety is a major concern to the Council and through its procedures and risk assessments it minimises the risk to staff and visitors as far as reasonably practicable.

Ongoing risk assessments are carried out to identify hazards encountered in excavation of graves by both manual and mechanical means, and risks that may be encountered by other maintenance operations and by the visiting public.

The Cemeteries' staff is trained in safety awareness, with specific staff being trained and certificated in the safe use of mini excavators, grave shoring techniques and other mechanical means which may be used.

The Borough notes the findings of the Ombudsman in relation to the safety of memorials and will strike a balance between public safety and public outrage when it applies health and safety requirements when managing and operating the cemeteries.

7.0 Burials and Graves

It is recognised that the appearance of cemeteries is enhanced by well kept and presentable graves which are in keeping with the philosophy of a peaceful and pleasant environment of the cemetery. Graves play an important part in the ambiance of the cemetery and the Authority wishes to promote a good standard of ground maintenance and well kept graves.

It is appreciated that graves and burials may not always be of a traditional type and therefore the sections below indicate the policies which the Authority will adhere to.

7.1 Other Burials

The Authority understands that communities within the Royal Borough may not require the “traditional” Christian burial and where possible will facilitate and accommodate other forms of burial convention, service or ceremony. Where the Authority can not accommodate such burials it will advise relatives and families of neighbouring Authorities or partnering organisations who provide alternative burials to meet the wishes of the bereaving families and relatives. Although not an obligation upon the Authority, funerals can be normally arranged within twenty-four hours if requested on account of a “spare” grave being kept available.

7.2 Green/Eco-friendly Burials

The Authority recognises that “environmentally-friendly” burials are a matter of degree and personal belief. The authority will allow the use of wicker or cardboard coffins.

The Authority is able to offer to supply plant and maintain a suitable tree, at a reasonable cost to the bereaved in one of its parks such as Holland Park.

The Authority fully supports the use of environmentally-friendly materials and practices within our cemeteries.

7.3 Children's' Graves

There is no dedicated Children’s Graves area in either cemetery on account of the lack of space available. Current practice is to encourage the bereaved parents to purchase a full adult sized 2.40m (8ft) grave (as opposed to a 1.50m (5ft) Children’s grave) so that they can in time be buried alongside of their child. This has proven to be very well received.

7.4 Welfare Burials

The Royal Borough treats welfare burials with the greatest of dignity, sympathy and respect as it does for all other categories of burials. Where the deceased person has no relatives or relatives cannot be traced or the family cannot afford the burial and funeral costs, the Local Authority will make the funeral arrangements. These burials are provided in un-purchased or public graves otherwise known as 'Common Graves', Space for further burials cannot be reserved in these common graves and a fixed memorial is erected in time.

This Borough complies fully with its statutory duties detailed in Section 46(1) of the Public Health (Control of Disease) Act 1984 regarding welfare burials.

7.5 Exhumations

The exhumation of the deceased is a high risk health and safety issue with hazards during the excavation work and the potential risk of infectious disease. Therefore all exhumations will be carried out in accordance with the Institute of Cemetery and Cremation Management 'Code of Safe Working Practice for Cemeteries', and the Health and Safety Executive (HSE) guidance 'Controlling Risks of Infection at Work from Human Resources'.

Not with-standing the various options discussed below (Paragraph 10.0), exhumation will always be the last resort that the authority will undertake. It will try to resolve issues by alternative means before embarking upon an exhumation. However, where an exhumation is required then the exhumation of the deceased will be undertaken with sensitivity, respect and dignity.

7.6 Pre-purchased Graves

The authority has a policy of allowing the pre-purchase of the lease on grave plots in both its cemeteries. Out of the average of 215 burials per year, 98% are in Gunnersbury. Of all these burials approximately 85% are in pre-purchased graves. The lease is for a period of seventy-five years, and for reasons given below, this must be urgently reviewed.

The existing policy of pre-purchased graves can have a detrimental effect on the life expectancy of a cemetery and this has been calculated elsewhere to be anything up to 15% on the operational management of the cemetery. This is expected to be further exacerbated due to the peaks in the population demographic profile for the people born between 1946 and 1964 ("Baby Boom" era). That generation is currently still in employment and benefiting from improved diets, general standards of living and health care and is not expected

to start dieing in significant numbers before 2016/20. Once it does, however, there will be for approximately twenty years an unprecedented demand for burial as well as ash internment space.

The policy of permitting pre-purchased graves in the Royal Borough is an area that may need re-appraisal. The advantages of removing the option of pre-purchased graves are as follows:

- a) All grave spaces are used (some pre-purchased graves remain unused).
- b) Graves are only excavated when required.
- c) There are always graves available.
- d) The life expectancy of a cemetery can be extended by up to 15%.
- e) Mechanical methods can be used (which are safer and more effective than manual digging) more easily.
- f) It is safer as there are always three sides of an excavation where the ground is undisturbed.
- g) Where there is rocky ground sections within the cemetery excavation have to be dug twice with the associated costs.

Conversely, critics would then point out that:

- a) Relatives can no longer pre-purchase a grave next to a relative.
- b) There would be no opportunity to purchase a number of plots within a row.
- c) The current feeling of choice that is possibly a selling point of Gunnersbury would be denied.
- d) New areas would be “managed” in a clinical manner.

7.7 Burial of Cremated Remains

Since the end of the Second World War Cremation has become increasingly popular and by the late 1960's had become the principal means of disposal of human remains. Currently around 70% of deaths in this country are followed by cremation. It is expected that it will become even more marked in the future on account of the shortage of burial space, the possible reduction in lease periods from seventy-five years and increasing expense of having a full grave dug .

Designated areas within Gunnersbury Cemetery are provided and kept for the burial of cremated remains. These are interred at a depth of 60mm.

8.0 Legislation

Many of the original Acts of Parliament were passed in the 1850's when the State and Private Cemeteries replaced the Church as the provider of grave space, have since been super-ceded. Examples of the many pieces of subsequent legislation include: Cremation Act of 1902 Cremation Regulations of 1930; Cremation Act of 1952; Local Government Act of 1972; Local Government Orders of 1977; Environment Protection Act of 1990.

There is, however, no statutory obligation upon Local Authorities to provide suitable spaces for the disposal of human remains. If they do, though, there is an obligation to comply with the Local Authorities' Cemeteries Order 1977 (LACO) which replaced the previous burial laws.

In a consultation document in January 2004 the current Government indicated a desire for placing an obligation upon local authorities to assess regularly "their communities' needs for burial facilities, and to plan to address any under-provision, whether simply in volume, or whether also in diversity of facilities available".

PART B: IDENTIFIED BUSINESS RISKS

9.0 Diminishing income:

Fees and charges are set annually by the Council. The objective is as far as possible to make the cemeteries cost neutral by balancing the costs of the service against the income generated through the sale of plots and actual burials. In 2006-07 expenditure is budgeted to be £628,000 and income anticipated to be £592,000 leaving an anticipated shortfall of about £36,000.

In the ideal world the cemetery would be financially self-financing with the substantial maintenance costs being balanced by the income generated through the sale of plots and funerals. This unfortunately is not a realistic expectation.

The Borough in setting its fees and charges considers and compares other local authority charges. All fees and charges are determined by balancing what is a reasonable cost, comparison with other neighbouring authorities and the expenditure for managing and operating the cemeteries.

As is to be expected, the bereaved would prefer their relatives to be interred close to home. Consequently, most of the income (about 69%) is generated from the higher paying non-residents of the Royal Borough – this being on account of the physical location of both cemeteries some distance outside of the borough's boundaries. This is unlikely to change.

The cemetery fees do not include a charge for recovering the cost to "make safe" the memorials as these are, wherever possible, passed directly on

to the owner. Only when the owner cannot be traced, are these costs met by the Royal Borough.

The income into the Cemeteries is likely to diminish on account of two factors: a change of burial practice – switching from burial to cremation and a diminishing amount of land being available for burials to take place in the cemeteries.

As both cemeteries reach maximum capacity the income generated will be drastically reduced. In the late 1990's it was estimated that London would run out of burial space by 2005. It didn't - but the message was clear and by January 2004 the Home Office had started to consult with local authorities on how best to resolve the problems not just of a looming shortage of space (that is developed further in Paragraph 10 below) but also the issue of how to generate income to maintain existing cemeteries in the absence of a sustainable income from funerals.

10.0 Future Demands and Diminishing Space:

The Authority recognises that the capacity of the existing cemeteries is finite and is therefore forward planning in the long term the need for additional land for burials. This is in line with the population demographic profile. There are no proposals for the purchase of additional land for the provision of additional cemeteries.

In order to appreciate this section it is necessary to point out that cemeteries are both two dimensional and three dimensional. The former relates to the number of grave plots and the latter to the number of spaces for burial within each plot.

The remaining two dimensional capacities, based upon their existing layouts, of the cemeteries are estimated to be:

HANWELL 13,500 max 13,300 occupied 200 remaining plots

GUNNERSBURY 19,750 max 18,572 occupied 1,178 remaining plots

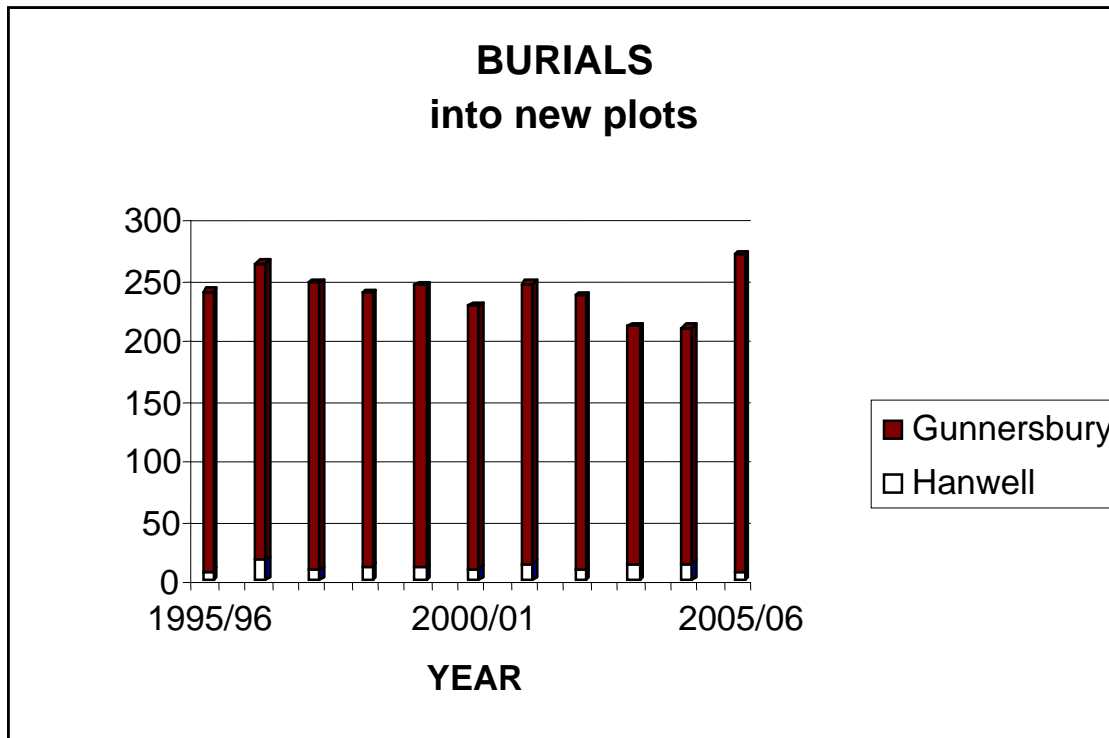
*As at 31/12/2006

This means that on current sales / demand we could expect each to reach maximum capacity as follows:

Location	Uptake of new plots (ave.)	Years left
Hanwell	11 new p.a	18 years

Gunnersbury	144 new p.a	8-10 years
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These figures are based upon current demand. It is not possible to accurately predict future demand, however the chart below demonstrates year on year the total number of burials over the past ten years:



However, this does not mean that there isn't further spare capacity as the figures above are based solely on the number of plots.

The standard local authority cemetery is planned and managed on the basis that up-to three coffins can be interred in each plot purchased. In their consultation of January 2004, the Government asked local authorities and others to consider whether existing burials should be disturbed to enable old graves to accommodate new burials. The total number of interments into existing empty grave plots is therefore estimated to be:

HANWELL 600 remaining interment spaces
GUNNERSBURY 3,534 remaining interment spaces

10.01 Options:

The following options for extending the “life” of the cemeteries are in no particular order of suitability.

1. As not all graves have been dug to their full depth of 2.40m (3 coffins) or hold their maximum number of coffins. Some have been purchased and only dug to 2.10m and could thus on the expiry of their 75 year lease be lowered to 2.40m and then re-used.

This was a key component of the Home Office’s Consultation of January 2004 and has subsequently been piloted by the Corporation of London ahead of legislation making its way through Parliament. The Corporation has additionally found recycling the original tombstones has been an acceptable practice with the latest leaseholder using the original stone turned around so that the earlier burial is still visibly recorded on the reverse side.

2. As some graves have been dug to their full depth but only partially used, these could be re-opened and have additional remains added – again on the expiry of the lease.

3. The consent of the next of kin is usually dispensed with where the remains were buried 100 years or more previously. This is twenty-five years after the expiry of the longest lease awarded by the Royal Borough.

4. Another option that should be explored is changing the system under which welfare graves are utilised. The proposal is that unless there is a fundamental religious or other ground known to the authorities, all deceased persons qualifying for burial in a Common Grave be cremated and their ashes interred in a common grave dedicated specifically for this purpose.

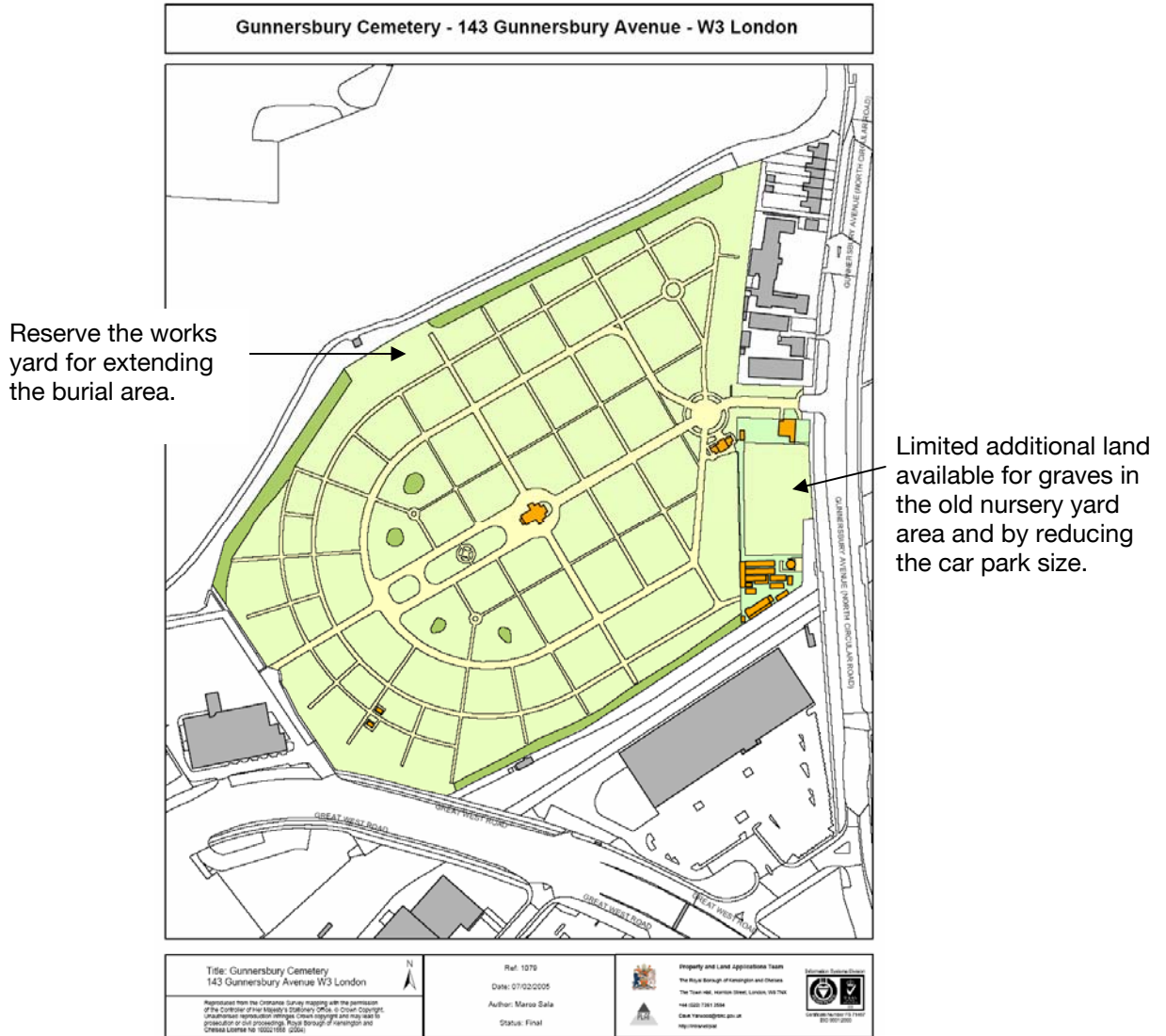
5. Yet another option is burying *between* the existing graves. It may only be Hanwell Cemetery where that is possible given the wider path pattern adopted by the Victorians. A “resistivity” geophysical survey would confirm that. It may also be that such a side-shifted cemetery could only hold single coffins (at 1.5m or 1.8m depth) in each grave on account of the danger of collapse if the full 2.40 metres were dug.

6. Consideration in the future could be given to reducing the new park size and taking up the adjoining nursery yard (poly tunnel area) (see map below) as well as the Works Yard adjoining Gunnersbury Park. It is estimated that this would provide between 990 and 1200 grave spaces. This in turn would equate to an extra seven to nine years of use based upon current uptake of new plots.

7. There are in some communities however, strong religious and traditional grounds for continuing to opt for burial and these must be respected. Consequently using high fees as a means of discouraging disposal by earth

burial in favour of the internment of ashes following cremation would not as a consequence be popular or free of unfavourable criticism. In order to reduce the possibility of that being an issue, consideration should be given to raising the costs of plots (that are normally purchased during a person's life-time) to a mark just acceptable to the market and continuing to then raise the cost of burials at the current rate of inflation. This should have the desired effect of encouraging cremation followed by the internment of ashes rather than purchasing of plots, yet also protect those already owning plots from unacceptably high burial costs in the future.

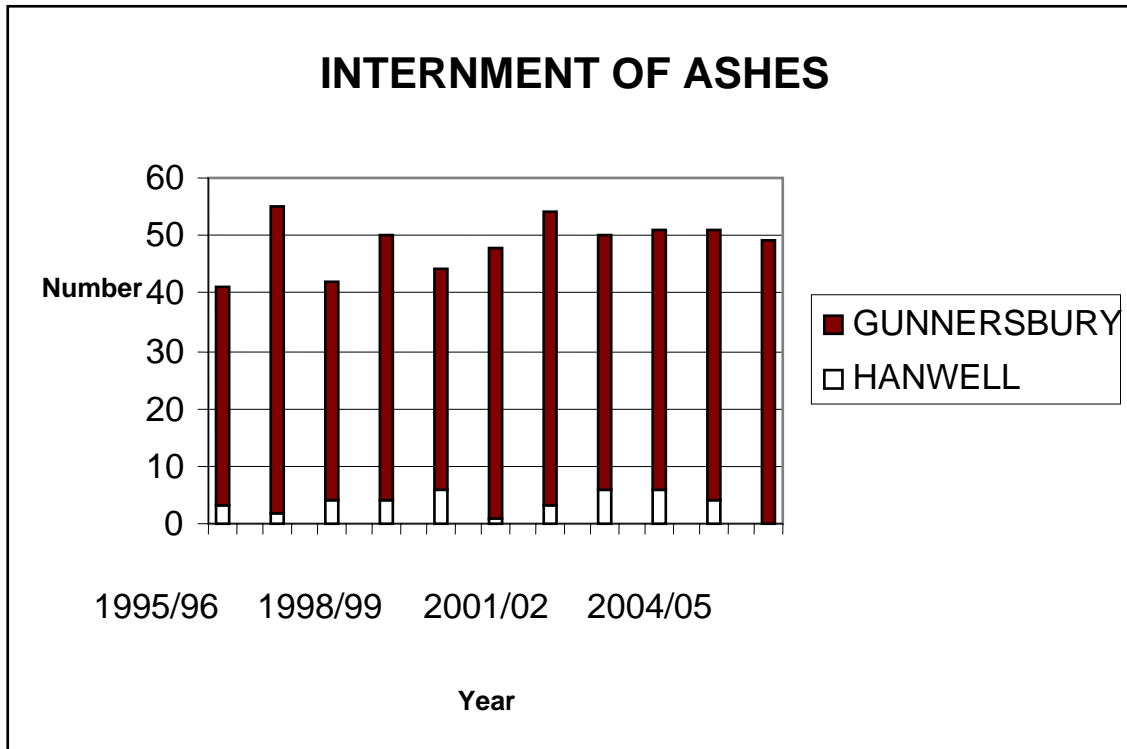
8. Although the Royal Borough does not have its own crematorium the burying of ashes is an increasingly popular practice on a national level and as a consequence an additional area was set aside and landscaped in Gunnersbury Cemetery during 2006. Consideration could be given to the creation of such a facility in Hanwell Cemetery – although the charts below demonstrate that demand at present is fairly consistent.



10.02 Cremation:

Only in five countries other than Great Britain has cremation exceeded disposal by earth burial: Czech Republic, Denmark, Hong Kong, Sweden and Switzerland. (D. Smale – summary of the position up to 2000.)

The chart below demonstrates demand for space in which to inter ashes has been taken up over the past decade.



PART C OTHER CONSIDERATIONS

11.0 Undisturbed spaces:

As areas of particular quiet and lack of general daily disturbance, the cemeteries do have the potential for conservation or controlled development as areas of specific or special scientific and ecological interest. This should be encouraged and it is anticipated that more will be done in the future to access their current biodiversity and ecological value as well as study how this can be better managed or fostered. This also leaves open possibility in the future for the re-use of filled cemeteries.

The Royal Borough's Local Biodiversity Action Plan for 2007-2011 proposes to study Churches and Cemeteries as a specific habitat with its own Habitat Action Plan. Ealing and Hounslow both have similar plans which may impact upon these cemeteries.

12.0 Records:

All burials in cemeteries provided under the Local Government Act 1972 and the Local Authorities' Cemeteries' Orders 1977 must, as soon as reasonable

practicable after any burial in the cemetery, be registered in “durable black ink” in a book supplied by the burial authority concerned and kept by an officer or person appointed to that duty.

The register records the name of the deceased and information such as the date of burial, age of the deceased, address, etc.

The Local Authorities’ Cemeteries (Amendment) Order 1986 also provides for these records to be kept in a computer. This is a secure method that also assists local history research as well as genealogists.

Currently the borough’s records are stored in site safe in Gunnersbury. This was identified as being inadequate under an audit into Business Risks facing the service in 2005 (J. Lucas). The records could be destroyed by damp (high risk) or by fire (low) or theft (moderate to low).

Options for consideration are digital scanning of them (an estimate has been received in the order of £97,000 for approximately 110,000 records) or to build a purpose-built archive on site.

13.0 Customer Care:

A Charter for Cemeteries Owned by the Royal Borough of Kensington and Chelsea

While it is the Borough's intention to adhere to recognised standards for the bereaved the following guiding principles are used:

- **Caring for the Community**

All burials are managed with competence and efficiency, to ensure that the entire bereavement experience occurs without error or insensitivity and meets the religious, secular, ethnic and cultural needs of the bereaved.

- **Health and Safety**

The service complies with all statutory duties and Health and Safety requirements including good practice.

- **Service Sensitivity**

The cemeteries are managed to create and maintain an atmosphere of solace and respect throughout the entire proceedings. This sensitivity will extend to all staff and contractors working on site during a funeral.

- **Staff**

Management emphasise the need for proper conduct and demeanour, as well as technical expertise. Staff endeavour to speak in a manner that recognises the sensitivity of bereavement, both during and outside working hours.

- **Environment**

The Authority will always endeavour to minimise the impact of bereavement upon the environment and encourage the greater use of environmentally friendly materials and practices.

- **Responses**

The Authority has a standard that it will respond to all cemetery enquiries within five working days and resolve all outstanding issues within three months where possible.

- **Crime and Vandalism**

The Authority will continue to actively pursue with enforcement agencies any person wilfully or intentionally committing crimes or acts of vandalism within its cemeteries and closed churchyards. It works in partnership with the police, fire service, youth offending teams, probation services and other partners to highlight and raise awareness of the need for respect within its cemeteries.

14.0 Standards for Memorial Masons working in The Royal Borough Cemeteries:

To ensure uniform, comprehensive and consistent standards for memorial erection in its cemeteries, the Authority will apply the British Register of Accredited Memorial Masons (BRAMM) Standards.

15.0 Standards for Funeral Directors working in the Royal Borough's Cemeteries:

The Authority expects Funeral Directors to adhere to the Code of Practice for the National Association of Funeral Directors as detailed at Appendix 9.

In general terms, funeral directors shall:

- a) Act in a courteous, sensitive, dignified and professional manner and must not pressurise or exploit clients in the difficult circumstances following bereavement.
- b) At all times offer the best advice and provide the best possible service commensurate with the charges made.

- c) Respect the confidential nature of the information given to them and only use that information for its proper purposes.

16.0 Dealing with Anti-Social Behaviour in Cemeteries:

The Authority wishes to promote respect for our cemeteries within its communities. It will work in partnership with external agencies such as the Youth Services, Police, Neighbourhood Wardens to engender an attitude of respect for the deceased and our cemeteries.

Examples of anti-social behaviour that have been experienced in the Royal Borough are as follows:

- Theft of personal mementos from graves.
- Vandalism to headstones.
- Dog fouling on graves.
- Vandalism to Chapels and other buildings.
- Entering premises outside opening hours.
- Under age drinking.
- Drug-taking and substance misuse.
- Destruction of floral tributes on graves.

Many of these have the potential to cause distress to families and relatives of the deceased, especially if occurring at children's' graves.

17.0 Measures to Combat Anti-Social Behaviour and the Fear of Crime:

The Authority will:

- a) Actively pursue by legal means any person caught wilfully damaging, committing vandalism or carrying out anti-social behaviour and enforce the law or seek other agencies to enforce laws against perpetrators.
- b) Apply the Anti-Social Behaviour Strategy of the Royal Borough Crime and Disorder Partnership to our cemeteries.
- c) Improve – if and where necessary - any boundary security and gate locking routines.
- d) PCSO's will be asked to carry out patrols during and outside opening hours, as needed.
- e) Inter-agency action to curb alcohol sales to juveniles and reduce substance nuisance in cemeteries.
- f) Erect signage and interpretation boards to promote the heritage value of cemeteries.
- g) Outreach to local schools, youth and community groups to educate and increase awareness of and respect for cemeteries and the bereaved.

h) Develop closer links with other agencies such as the Probation Service, Police etc., to engender the appreciation of cemeteries and where possible engage young people to enhance the cemeteries environment.

18.0 Testing of Memorials, Headstones and Kerb Sets:

In recent years, a number of local communities nationally have been shocked and aggrieved by the actions of councils laying flat hundreds of grave memorials as a result of health and safety inspections. To people visiting after the event it has looked as though vandalism on a large scale has desecrated their cemeteries.

Numerous complaints have been made to the Local Government Ombudsman as a consequence. They found maladministration in the failure to ensure adequate publicity/notification before carrying out stability testing or laying down individual monuments which failed the test; not having in place a proper system for risk assessment and subsequent prioritisation of work; lack of proper training for those carrying out testing and the failure to seek advice from a suitably qualified person.

It is clear that there is continuing public concern on this very sensitive issue. The Ombudsman has set out some general guidance on memorial safety testing so that burial authorities, including the Royal Borough, may avoid causing widespread offence to the public. It is possible to do so without compromising local authorities' important duties to protect the health and safety of the public.

It is the Ombudsman's view that it should not be necessary for burial authorities to lay down grave memorials on any large scale.

Memorial stability has aroused widespread concern. A small number of tragic accidents and deaths, in particular to children, raised public awareness and in a number of cases required the intervention of HSE and its statutory enforcement powers.

The Royal Borough believes there is a balance to be struck between public safety and public outrage. We recognise that certain memorials pose an immediate danger with a high risk of injury. Others may display a degree of instability without the same degree of risk, perhaps because of their size and/or location. Through advice, promotion and a balanced view it will be recognised that action other than laying-down will almost always be the most appropriate remedy.

18.1 Current Position in the Royal Borough's Cemeteries:

Any memorial standing 200 mm high or more is required to be tested. Of concern is that the experience of other burial authorities is that the newer 'lawn' style memorials exhibit the highest proportion of failures.

The Council began in 2005 to carry out testing of all large memorials in Gunnersbury cemetery, as the larger and older memorials are perceived as the most dangerous, if unstable, because of their size and weight. The bigger the memorial-stone the greater potential risk to passers-by, visitors, mourners and staff.

Although a much older cemetery, and therefore containing potentially more memorials of doubtful stability, Hanwell is almost full and consequently much less visited. This meant that the greater risk is assessed as being in Gunnersbury which is still very active and attracts far more visitors.

Before each testing exercise, the procedure has been to fix signs to the cemetery gates announcing the start of the testing, to place advertisements in the Notices section of the local newspaper in the four weeks running up to the start, and invite all interested councillors, the local newspapers and members of the public to attend an open day at the start of the testing where methods used are demonstrated.

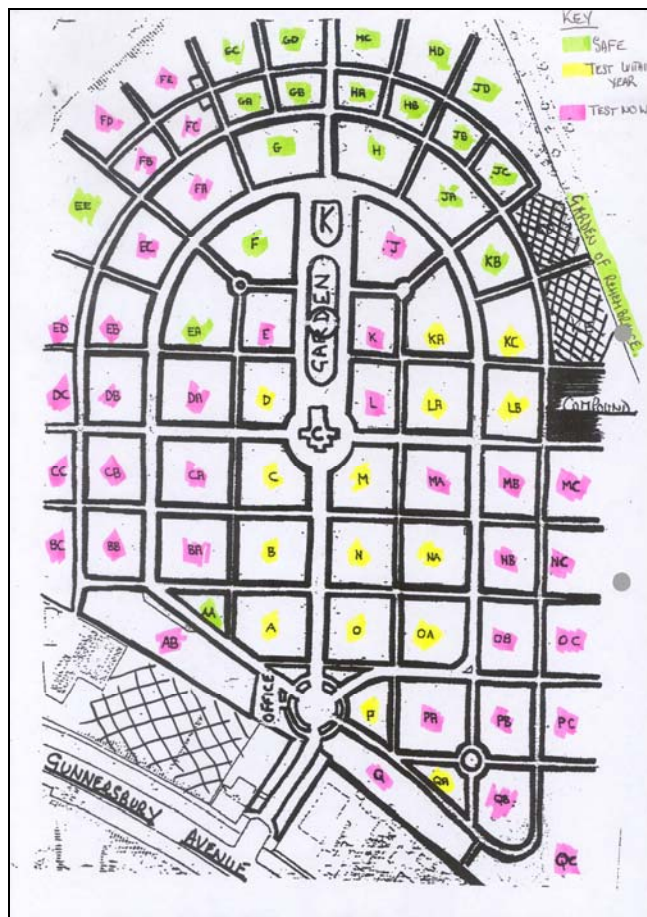
18.2 Testing programme for memorials the first five years:

- Year 1 – Gunnersbury Red
- Year 2 – Gunnersbury Red, Gunnersbury Orange & finger-test
Gunnersbury Green
- Year 3 – Hanwell Red
- Year 4 – Hanwell Red, Hanwell Orange and finger test Hanwell
Green

This programme will be subject to review depending upon risks and resources etc.



Hanwell Cemetery Initial Assessment 2005



Gunnersbury Cemetery Initial Assessment 2005

18.3 Financial Implications of Testing:

As a consequence of the age and size of these two cemeteries there are obviously several thousands of memorials that require routine testing. Their ongoing testing with some repairs in all cemeteries currently costs about £15k per annum which has been allocated within the Council's budgets. This will need to be kept under review – particularly once the income into the cemeteries starts to falter.

Presently the actual physical testing, creating computerised records, staking and laying down are carried out by independent specialists. The main advantages are that the private contractor employed currently has the expertise and is independent sufficiently from the Council to ensure a completely unbiased appraisal.

PART D RECOMMENDATIONS

19.0 At his Policy Board Meeting of 10th March 2007, Councillor Paget-Brown approved the following recommendations:

19.1 General: That the Royal Borough recognises the responsibilities that it has for continuing to maintain the cemeteries to the high standards currently held and that it continues to ensure Residents the option of being buried within one of the Royal Borough's cemeteries.

19.2 Fees and Charges: While it is important that the fees and charges keep pace with inflation and those charged by surrounding boroughs, above-inflation increases should not become an added burden upon the bereaved that choose to bury their dead within our cemeteries and who opt on grounds of religious faith for burial rather than cremation. Instead, consideration should be given to raising the costs of plots (that are normally purchased during a person's life-time) to a mark just acceptable to the market and continuing to then raise the cost of burials at the current rate of inflation.

19.3 Diminishing space: That the land identified in 10.01.6 is considered for redevelopment as burial space in the future in order to extend the life of Gunnersbury Cemetery. This is not critical at the moment, but will need addressing in the next seven or eight years.

19.4 That the recommendations of the Home Office for deeper re-internment / recycling of graves is considered for Hanwell Cemetery and that as a first step towards such consideration a full 'resistivity' geophysical map be drawn that precisely identifies the location and depth of each grave.

19.5 That consideration is given to cremating the remains of deceased persons who would otherwise have been buried in a welfare grave, and their ashes then interred. (Cremation Regulations 1965, Regulation 7 (a), (b) and (d).)

19.6 Health and Safety: That the practice of routinely pressure-inspecting all memorials in order to confirm their stability be continued and that where-ever possible the costs of these tests and any subsequent repairs be passed on to the identified owners of the grave.

19.7 Ecological value: That the ecological value of the cemeteries be assessed and improved as per the Royal Borough's Local Biodiversity Action Plan and any similar action plans held by the London Boroughs of Ealing and Hounslow within whose boundaries these cemeteries are located.

19.8 Records: That consideration is urgently given as to how best to store and / or preserve the Cemeteries' Registers.

20.0 Acknowledgements

Davies' Law of Burial Cremation and Exhumation 7th Edition - David Smale (Shaw & Sons Ltd)- 2002

English Heritage

HM Government: Home Office

Institute of Cemeteries and Crematoria

Corporation of London

London Borough of Ealing

London Borough of Camden

London Borough of Hounslow

London Borough of Islington

Royal Parks Agency: Brompton Cemetery

Streetly Cemetery and Crematorium

and the many unrecorded local authority web sites from whom all manner of facts and ideas have been gleaned.

APPENDIX ONE:

Notional level of activities

Description	Unit	2006	2005	2004
Excavations of graves 5' depth	per grave	110	108	104
Excavations of graves 7' depth	per grave	70	102	73
Excavations of graves 8' depth	per grave	24	40	23
Raising memorials on neighbouring graves	per grave	6	6	6
Preparation of grave prior to funeral (including cremated remains)	per grave	274	304	258
Backfilling of graves (including cremated remains)	per grave	274	304	258
Topping up of graves	per grave	131	137	191
Internments in "common graves"	per grave	11	7	4
Internment of cremated remains	per grave	59	46	54
Exhumations	per grave	4	1	0
Levelling of grave memorials / timbering	per grave	22	19	22
Planting and replanting on "maintained" graves	per grave	136	137	119
Maintenance of "maintained" graves	per grave	136	137	119
Washing gravestones on "maintained" graves	per grave	101	94	65

APPENDIX TWO:

GUNNERSBURY AND HANWELL CEMETERIES RULES AND REGULATIONS

REGULATIONS made the and operative from that date for Management of Cemeteries and Burial Grounds owned by the Mayor and Burgesses of The Royal Borough of Kensington and Chelsea

PART I - INTERPRETATION ADMISSION AND FEES

1. DEFINITIONS

- (a) "Council" means the Mayor and Burgesses of The Royal Borough of Kensington and Chelsea and its authorised officials
- (b) "Cemeteries" means the cemeteries provided by the Council at Gunnersbury and Hanwell and any future acquisition of burial land
- (c) "Memorial" means any shrub plant head stone foot stone ledges kerbs tablets vases or monument
- (d) "Cemeteries Manager" means the Council's Manager for the time being or the Officer in charge of each of the Cemeteries as appropriate
- (e) "Burial" "Grave" "Tombstone" "Vault" "Walled Graves" shall have the meaning ascribed to them in the Local Authorities Cemeteries Order 1977
- (f) "Cemetery Office" means the Cemetery Office situate at Gunnersbury Avenue
- (g) References to the Local Authorities Cemeteries Order 1977 or any provision thereof shall include any order or provision substituted therefore, by statutory instrument or other authorised means
- (h) "The Director" shall mean the Director of Waste Management and Leisure for the time being appointed by the Council
- (i) A "private grave" shall be a grave in which the exclusive right of burial has been granted to an individual or individuals by the Council
- (j) A "grant" shall be the grant of the exclusive right of burial to an individual as issued by the Director
- (k) A "common grave" shall mean a grave in which the exclusive right of burial has not been granted
- (l) A "close relative" shall mean a husband wife partner father mother son daughter grandparent grandchild step-father step-mother step-child. The Director may at his discretion allow other relatives to be buried should he consider that the circumstances so warrant it
- (m) Except where a Regulation refers specifically to Gunnersbury Cemetery or Hanwell Cemetery all Regulations shall be considered as applying to all Cemeteries in the Royal Borough of Kensington and Chelsea from time to time
- (n) "Owner" means the person or persons registered as the owner of a private grave space
- (o) "Grave space" means the parcel of land bought for the purpose of interment
- (p) "Tablet" means tombstone memorial headstone
- (q) "Section" means the area of land upon which the grave space is located

- (r) "Number" means the grave number.
- (s) "Normal office hours" means 9.00 am to 5.00 pm Monday to Friday
- (t) "Resident" means a person whose only or main residence for a period of at least two years continuously in the last five years was within the Royal Borough of Kensington and Chelsea
- (u) "Former resident" means a person who would have qualified as a resident but who left the Royal Borough more than five years ago
- (v) "Non-resident" means a person resident outside of the Royal Borough of Kensington and Chelsea

2. HOURS OF OPENING

(a) The Cemeteries ground shall be open to the public from:
Monday to Saturday 9.00 a.m. to 7.00 p.m. April to September
9.00 a.m. to 5.30 p.m. February, March and October
9.00 a.m. to 4.30 p.m. November, December and January

Sundays and Bank Holidays 9.00 a.m. to 6.00 p.m. April to September
9.00 a.m. to 5.30 p.m. February, March and October
9.00 a.m. to 4.30 p.m. November, December and January

Christmas Day and Boxing Day
9.00 a.m. to 4.30 p.m.

(b) The Cemetery Office shall be open for the transaction of business from Monday to Friday excluding Public and Bank Holidays between the hours of 9.00 a.m. and 5.00 p.m. or such or hours as the Council may by Resolution from time to time determine (normal office hours). Notice of changes will be published at least a week in advance on Cemetery Notice Boards

3. ADMISSION TO CEMETERIES

(a) No person other than a servant of the Council shall enter or be in any of the Cemeteries at any hour during which the Cemeteries are closed to the public except by the permission of the Cemeteries Manager

(b) Children under 14 years of age will not be admitted except under the care of a responsible adult person.

(c) No cars vans motorcycles or other vehicles will be admitted to the Cemeteries except with the consent of the Cemeteries Manager. Permission to hold a funeral will include the consent for such vehicles as may be reasonably required for that purpose to be brought into the Cemetery subject to the direction of the Cemeteries Manager. Special arrangements may be made with the Cemeteries Manager to facilitate vehicular access for people with disabilities.

(d) Dogs must be kept on a lead

4. FEES AND CHARGES

Unless the Council has approved other arrangements in any given case all fees and charges must be paid to the Cemeteries Manager prior to any interment or any works for the placing or erection of any memorial being carried out. The official receipt and permit must then be produced at the Cemetery Office before any interment or the erection of any memorial takes place. The matters in respect of which fees or other charges are payable are set out in the Schedule hereto and the amount of such fees and charges shall be determined from time to time by the Council by Resolution. A table of the fees and charges currently in force shall be available for inspection by the public at the Cemetery Office during normal office hours

5. RESIDENT/FORMER RESIDENT/NON-RESIDENT

A resident of the Borough may acquire the exclusive right of burial in a grave, and single fees will be charged therefore and in respect of his interment therein. Single fees will also be charged for interment of a resident in an un-purchased grave for which no exclusive right of burial has been granted

The fees, payments or sums for any interment, for the exclusive right of burial in an earthen grave, will be trebled in the case of any person who is not a resident of the Royal Borough of Kensington and Chelsea, and doubled in the case of a former resident

PART II - PURCHASE OF EXCLUSIVE RIGHTS OF BURIAL AND INTERMENT GENERALLY

6. PURCHASE OF PRIVATE GRAVES

(a) The exclusive right of burial in a grave may be purchased subject to the following Regulations. Such rights shall be limited to a period of seventy five years from the date they are granted

(b) The selection of grave spaces is in every case subject to the approval of the Cemeteries Manager

(c) A private grave space may be reserved on payment of the fees for the exclusive right of burial and including a 50 per cent surcharge. The interment fees will become payable when the grave is opened.

(d) All Applications for the purchase of new private graves must give the full name and address of the purchaser with suitable evidence such as a Passport Driving Licence Credit Card and last account Council Tax demand and up-to-date payment receipt and any person who makes any false statement in

connection with this paragraph will be in breach of these Regulations and liable to the penalties set out in paragraph 29 below.

(e) No grant will be issued in the name of an undertaker or firm of undertakers or a partner in such a firm unless satisfactory written evidence is submitted that the grave is required for use by the applicant as a private individual and not for business or other purposes.

7. TRANSFER OF PRIVATE GRAVE GRANTS

(a) No grant of a private grave shall be transferred except with the written consent of the Director

(b) An application for the transfer of a grant in cases where the grave-owner is deceased should be accompanied by Probate Will or Letters of Administration or such other written evidence as the Director may reasonably require proving the applicant's legal right to ownership. In the event of no Probate, Will or Letters of Administration being produced, the Director may transfer the ownership of a grave to any person proving that he or she has legal or legitimate right of ownership

(c) A fee as determined by the Council from time to time will be payable in respect of every transfer of ownership effected

(d) Upon a transfer of any grant (other than by devolution under a Will or intestacy) to a person who is not a resident of the Borough of an exclusive right of burial, the difference (if any) between the fees which were paid by the Transferor and the fees which the Council would be entitled to receive from the Transferee as purchaser at the time of transfer must be paid to the Council.

8. REMOVAL OF HUMAN REMAINS

No human remains may be removed from a grave on consecrated ground after committal without the necessary Faculty from the Bishop of the Diocese and/or Licence from the Home Secretary first being obtained. In cases where other coffins are to be disturbed, written authority of the next-of-kin of the deceased persons buried in the coffins must be obtained.

9. NOTICE OF INTERMENT

(a) Notice of any intended interment shall be given on the form prescribed by the Council obtainable from the Cemetery Office and all information required to complete the Notice shall be entered thereon

(b) The Notice must be delivered together with the appropriate fee and where applicable the owners consent referred to in Paragraph 12 and other supporting documentation specified by the Cemeteries Manager during normal office hours to the Gunnersbury Cemetery Office at least four clear working days prior to the interment. No Notice will be accepted outside normal office hours except in cases of urgent necessity

- (c) The Cemeteries Manager shall refuse any application for interment if any of the said documentation has not been supplied, is incorrect or incomplete
- (d) Where it is desired to bury more than one person in the same coffin separate Notices of Interment shall be given for each person to be buried.
- (e) No authority is required for the burial of the registered grave owner but the grant of the grave should be produced for endorsement
- (f) The Council shall not be held liable for any interment in a private grave inconsistent with the strict legal right of the grantee. The Council may insist on the production of Probate or other evidence to prove devolution of the title. The Council may also require the completion of a form indemnifying the Council against any actions claims etc signed by the person who claims that he or she has a legal right to authorise an interment to take place in the grave.

10. CERTIFICATE OF DISPOSAL

A Burial will not proceed unless the Certificate of the Registrar of Deaths or Coroners Order for the disposal of the body to be buried is first delivered to the Cemeteries Manager before interment.

11. HOURS OF INTERMENT

- (a) The time of any proposed interment shall first be arranged with the Cemeteries Manager at the Cemetery Office. Services in the Cemetery Chapels should not be longer than sixty minutes without the written consent of the Cemeteries Manager. In the event of a funeral being delayed through no fault of the Council, the Cemeteries Manager reserves the right to re-arrange or curtail a funeral ceremony to enable other funerals arranged for the same day to take place
- (b) All interments shall take place after 10.00 a.m. and shall be completed before 4.00 p.m.. No interments are permitted on Saturdays Sundays Christmas Day Good Friday or Bank Holidays. The Council reserves the right at any time to close the Cemetery on any day should it consider that circumstances so warrant.
- (c) All persons arranging funerals are required to comply at all times with the instructions of the Cemeteries Manager or persons appointed to discharge those duties and to notify the Cemeteries Manager if a funeral is likely to be attended by an unusually large number of persons, or where special arrangements or facilities are required

12. CLERGY

- (a) It is the responsibility of the person having charge of the funeral to make all arrangements in advance with the Clergy or other Minister to officiate.

13. OWNER'S CONSENT

The written consent of the owner or his or her legally authorised representative of a vault or grave in which the exclusive right of burial has been purchased must be deposited at the Cemetery Office before the grave shall be opened, except in the cases specified in Article 10(6) of the Local Authorities Cemeteries Order 1977 as being exceptions to the need for such consent. In all cases, the relationship of the owner to the person to be interred must be stated. Where applicable the owner's consent must be delivered to the Cemeteries Manager in accordance with the time limits specified in paragraph (b) of Regulation 9

14. DEPTHS OF GRAVES

- (a) All graves will be dug excavated and filled in by persons appointed by the Council under the supervision of the Cemeteries Manager
- (b) A body shall not be buried in a grave so that any part of the coffin containing the body shall be a depth of less than three feet below the level of the surface of the ground adjoining the grave unless the Council specifically so authorise in any given case
- (c) A body shall not be buried in a grave in which an interment has already taken place unless the coffin containing the body is effectually separated from any other coffin already placed and remaining in the same grave by means of an undisturbed layer of earth not less than six inches in thickness and provided always that any human remains already interred in the grave shall not be disturbed. Soil shall not be removed from the grave.

15. VAULTS AND WALLED GRAVES

- (a) Vaults and walled graves will not be constructed
- (b) No body shall be buried in any existing vault or walled grave unless:
 - (i) It is in a sealed metallic coffin.
 - OR
 - (ii) It is in a sealed wooden coffin and separately entombed in an air tight manner, that is, by properly cemented stone or brickwork which shall never be disturbed

16. COFFINS

- (a) No body shall be delivered to the Cemeteries for burial unless in a closed cardboard, wooden or metallic coffin
- (b) In graves in respect of which the exclusive right of burial has not been purchased, coffins of wood only will be allowed to be interred
- (c) Not more than one body will be allowed in any coffin except in the case of mother and child or children of the same parents or casket of cremated remains. The name of the person whose body is to be interred must be indelibly engraved on a non-corrodible plate affixed to the coffin

(d) The Cemeteries Manager in his absolute discretion may direct that a coffin shall not be admitted to the Chapel or other Cemetery building if the circumstances so require.

17. NOTIFIABLE DISEASES

The Cemeteries Manager must be informed in writing prior to the funeral if the person to be interred died of a notifiable disease as defined by the Health Services and Public Health Act 1968. The body of a person who died of a notifiable disease shall not be allowed in a Chapel or other Cemetery building without prior written consent of the Cemeteries Manager

18. BANDS AND MUSIC

The Cemeteries Manager shall be given full details of any instrument bands or music of any kind which is to be played at a funeral other than music normally provided in the course of a service in the Cemetery Chapel and his written consent in respect of thereof must be obtained which may include restriction as to such times and positions within the Cemetery where such instrument bands music or thing which is played.

PART III - CEMETERY MAINTENANCE AND EXECUTION OF WORK

19. APPROVAL OF MEMORIALS AND INSCRIPTIONS

- (a) Before the erection of any Memorial the written consent of the Cemeteries Manager must first be obtained
- (b) No Memorial or erection of any kind shall be permitted upon or over any grave unless the exclusive right of burial therein has first been purchased
- (c) Subject to the exception hereinafter provided the Section and Number of the grave space must be cut clearly in one inch letters at the foot of each headstone or Memorial erected over or on the grave
- (d) A trade name may be cut clearly in one inch letters at the foot of each headstone or Memorial erected over or on the grave
- (e) The prior written approval by the Cemeteries Manager and payment of the appropriate fees must have occurred prior to any Memorials being erected or any inscriptions affixed thereon
- (f) In no circumstances shall the owner define, or attempt to define, the grave space in any manner not approved by the Council

20. ARRANGEMENTS FOR FIXING OF MEMORIALS

The fixing of Memorials or the placing of an inscription on a Memorial already erected may only take place during normal office hours and then only under the direction of and the authority of the Cemeteries Manager who may in his

absolute discretion either require work to cease or for adjoining areas to be fully protected from the said work

21. SIZES FOUNDATIONS AND FIXING OF MEMORIALS

(a) Before any work is commenced the Cemeteries Manager must be satisfied that any Memorial to be fixed in any of the Cemeteries has proper and adequate foundations, and shall be of such dimensions and construction that the Memorial shall be unlikely to sink or move from the position in which it is placed at the time of erection

(b) If any Memorial is removed from a grave for the purpose of an interment or otherwise it must not be replaced unless the requirements of Regulation 20 has been complied with. Any additional inscription or other works shall require approval under Regulation 20.

(c) Head Stones, Foot Stones and Crosses in the front row of Sections A, B, C, M, N, O and P, in the Inner Area of Gunnersbury Cemetery must not exceed two feet six inches in height measured from the natural surface of the ground. In the remaining portions of Sections A, B, C, M, N, O and P and in Sections MA, NA, OA, E, D, K and L of Gunnersbury Cemetery, no Head Stone, Foot Stone or Cross shall exceed three feet in height above the natural ground level.

(d) Except as provided by paragraph (c) of Regulation 21, Head Stones in Gunnersbury Cemetery must not exceed four feet six inches, plain Crosses five feet and Foot Stones eighteen inches in height measured from the natural surface of the ground. They must not be less than three inches nor more than six inches in thickness.

(e) Headstones at Hanwell Cemetery must not exceed four feet in height in the front row or five feet elsewhere, and Foot Stones must not exceed eighteen inches in height measured from the natural surface of the ground. Ornamental stones may be erected in the front row four feet to the shoulder and five feet overall.

The following are the maximum sizes permitted for erection of Memorials on the surface of the ground:

- Cremated remains section - 2 feet x 2 feet
- Double grave space - six feet six inches by six feet
- Single grave space - six feet six inches by two feet six inches
- Large grave space - nine feet by four feet
- Medium grave space - seven feet by three feet

(g) Without prejudice to paragraphs (c) and (d) of this Regulation:

(i) Memorials without kerbing must be dowelled or joggled into a foundation of not less than four inches in thickness which foundation must be of a width corresponding with the width of the grave space

(ii) Memorials must be fixed securely on a solid concrete or hand sawn York Stone landing of not less than four inches in thickness which landing must be of such dimensions that it will rest securely upon the whole of the four sides of the grave space or alternatively cover the grave space entirely

(iii) The thickness of kerbs must not be less than three inches if consisting of granite or marble and not less than four inches if consisting of any other approved stone and not more than six inches. Adequate drainage must be provided where kerbs are fixed on the solid landing

(iv) Memorials must be fixed with copper or galvanized cramps. All bases of crosses and the bases of headstones must be securely fastened by dowels

(v) Chippings shall be laid on a foundation of not less than two inches thickness of concrete, on three inches of hard core or on two inches pre-cast concrete slabs raised on bricks of three inches in height.

(h) The whole of the work in connection with the fixing of Memorials must be carried out and completed to the satisfaction of the Cemeteries Manager. Such work must subject to Regulation 20 be carried out continuously and completed with all reasonable expedition

(i) No hewing or dressing of stones within the Cemeteries will be allowed and all unnecessary materials brought into the Cemeteries by the person erecting the grave stone or Memorial must be removed immediately

(j) All Memorials placed in the Cemeteries are so placed at the sole risk of the owner and the Council accepts no responsibility for any loss, damage or otherwise thereto

(k) The Council reserves the right of passage over all graves and the right to cover or move any Memorial in connection with burials in the Cemeteries.

(l) The Council reserves the right to temporarily place on any grave a Memorial from an adjoining grave. Any damage caused will be made good by the Council.

22. REPAIR AND REMOVAL OF MEMORIALS

(a) If a Memorial or vault headstone or kerbing is not kept in proper order or is deemed by the Cemetery Manager to be unsafe then the Council may remove or alter it in any way and any expenses incurred shall be paid forthwith by the owner. The owners will be advised in writing prior to such works taking place, unless emergency repairs are necessary. All Memorials removed for the purpose of interment shall be replaced by the Council's Contractor within twelve months of such interment taking place.

(b) No temporary Memorial erected on a grave shall remain for more than twelve months unless the written consent of the Cemeteries Manager is first obtained

23. PLANTING OF SHRUBS, FLOWERS, ETC

Except in respect of interment in Gardens of Rest the owner of any purchased grave may place small shrubs plants or flowers on the grave space and shall keep the same in a good and proper and tidy condition. The Council reserves the right to cut down or remove any shrubs plants or flowers which they consider in its absolute discretion to be unsightly or overgrown. The Council reserves the right to remove any receptacle or neglected or dangerous articles or materials from any grave. Memorials shrubs and plants may not be removed from any grave without prior written notice given to the Cemeteries Manager and the cost to the Council of undertaking any of the aforementioned shall be paid by the Owner

24. DAMAGE FROM EXECUTION OF WORKS

All damage caused by making or re-opening or closing a vault or the erection of a Memorial on any part of the Cemeteries must be forthwith repaired and made good to the satisfaction of the Cemeteries Manager by the person causing such damage. In default of such damage not being repaired or made good then the Council may undertake such works themselves and recover the cost thereof from the person causing such damage.

PART IV - LAWN SECTIONS AND GARDENS OF REST

25. LAWN SECTIONS

(a) Where any part of a Cemetery has been laid out as Lawn Section the following Regulations shall apply thereto in addition to the Cemeteries as a whole.

(b) No kerb shall be permitted over or around any grave but the surface will be turfed level with the surrounding ground and kept mown by the Council. An

area twelve inches wide will be left at the head of the grave for the provision of a Memorial if required or planting by the owner, the maintenance of which being carried out by the Council.

(c) If no Memorial is erected plants ordinarily growing at no greater height than eighteen inches may be planted in the space provided at the head of the grave or one flower vase, not glass or ceramic and not exceeding ten inches in diameter or nine inches in height may be placed thereon.

(d) Purchasers of the exclusive right of burial shall not carry out or have carried out any turf work of the grave, such work being carried out by the Council.

(e) A Memorial or headstone will be between rows at their heads and subject to the following:

(i) to the granting of consent in accordance with the other provisions of these Regulations;

(ii) any such permitted Memorial or headstone.

(f) A foundation shall be provided by the person erecting the Memorial or headstone. The foundation shall be a concrete slab 2 feet by 1 foot by 2 inches thick with a concrete block 4 inches thick tailored to meet the size of the base of the Memorial or headstone.

(g) The grave number shall be cut in accordance with these Regulations but at the bottom of the right hand side of the Memorial or headstone as viewed from the front or back.

26. GARDENS OF REST

(a) In that part of any Cemetery laid out as a Garden of Rest for the interment of cremated remains the following Regulations shall apply in addition to or where necessary in substitution for those applicable to the Cemeteries as a whole.

(b) The space allocated for each grave for the interment of cremated remains shall be three feet by two feet.

(c) Not more than four interments of cremated remains in any grave space of the above size.

(d) A Memorial in the form of a tablet of, such as, Westmoreland Slate, two feet x two feet x two inches on outer ring, one foot 6 inches to one foot on inner ring, shall be placed centrally on each grave space. The edges of tablets must be parallel to the boundaries of the grave space

(e) Such tablets shall be supplied by the purchaser of the exclusive right of burial in each grave space and shall be so fixed that the top of the foundation is one inch below the level of the surrounding ground. The purchaser shall be thereafter responsible for the maintenance and replacement of the tablet at his own expense.

(f) The tablet shall be placed in a position in conformity with the foregoing Regulations within a reasonable period of interment taking place in the grave space.

(g) The space between the Memorial tablet and the outer edge of the grave space will be turfed and maintained by the Council or the planting of small low growing annual bedding plants will be permitted at the owners expense.

(h) Purchasers of grave spaces shall not carry out or have carried out any turfing of the grave as such work will be carried out by the Council.

(i) Annual plants will be permitted to be planted on any grave but one flower vase incorporated into the design of Memorial stone is preferred and must be agreed by the Cemeteries Manager.

(j) A copy of the proposed inscription to be placed on the Memorial tablet shall accompany every application for the interment of cremated remains. A trade name can be cut on the reverse of the tablet in letters of one inch in height

PART V - OFFENCES AND PENALTIES

27. OBSERVANCE OF REGULATIONS AND OFFENCES

(a) All persons admitted to the Cemeteries are required to comply in all respects to the Regulations and Orders appertaining to the Cemeteries and shall be subject to the control and direction of the Cemeteries Manager.

(b) No vehicle shall be allowed to travel at a speed of more than ten miles per hour and shall use the main carriageway only. No vehicle will be permitted at any time to use any side or intersecting pathway except stone masons carrying out work at the Cemeteries and then only with the prior consent of the Cemeteries Manager.

(c) No person shall:

(i) Create any noise nuisance annoyance disturbance in the Cemeteries

(ii) Interfere with any burial taking place in any Cemeteries.

(iii) Damage destroy injure deface daub or interfere with any erection, structure (whether or not static) apparatus wall or fence belonging to the Council or any grave vault Memorial monument

tablet inscription or grave stone or any shrubs plant or flowers or any other things within the Cemeteries or any grave, walled grave or vault any tombstone or other Memorial.

iv) Play at any game or sport or unauthorised activity in the Cemeteries.

(v) Pursue or take any vermin game or other animal in the Cemeteries except for dogs on a lead.

(vi) Interrupt Cemetery employees in the course of their duties or without proper cause seek or attempt to obtain from any employee either directly or indirectly information relating to grave owners or pay or attempt to pay any gratuity to any employee

(vii) Distribute any business card or advertisement, seek or solicit orders for sale or offer for sale any articles or service of any kind, or carry on any other business in any Cemeteries which has not been authorised in writing by the Cemeteries Manager

(viii) Make for profit gain or any other purpose (unless authorised so to do in writing by the Cemeteries Manager) by drawing or sketch or taking any photographs of any grave Memorial building or funeral procession within the Cemeteries

(xi) Deposit or leave in the Cemeteries dead flowers wreaths weeds and other matter removed from a grave other than in the refuse baskets provided

(xii) Other than an authorised Officer or invitee of the Council no person or persons are permitted to remain in the Cemeteries after they are closed

(d) All persons visiting and/or working within the Cemeteries must comply in all aspects to the Rules and Regulations in force at that time and be subject to the control of the Cemeteries Manager

(e) Companies carrying out work in the Cemeteries will be required to make good any damage or meet any claim for such damage which may be caused by them in the process of their work.

(f) No member of the Council's staff may demand or receive any gratuity or unauthorised fee. Printed receipts signed by the Cemeteries Manager shall be given in all cases where money is received and no other receipt will be acknowledged by the Council.

(g) An application for permission to make films within the Cemeteries must be made in writing to the Cemeteries Manager and will be subject to the approval of the Director and the payment of any necessary charges

(h) Fly-tipping and/or the dumping of any refuse is prohibited in the Cemeteries

(i) Any member of the public having any complaints to make should report it in the first instance to the Cemeteries Officer. If, however, dissatisfaction is still felt after that course of action has been taken, the matter should then be referred to the Cemeteries Manager and thereafter (if the matter remains unresolved) to the Director. Should this procedure fail to satisfy the complainant a written application may be made to the Council on an official complaints form obtainable from The Formal Complaints Officer, Council Offices, 37 Pembroke Road, London W8 6PW, Telephone Number 0171-341 5105.

28. PENALTIES

(a) The Cemeteries Manager shall have power to eject from the Cemeteries any intoxicated or disorderly person or any person in breach of any of the Regulations and Orders appertaining to the Cemeteries and such persons shall not return to the Cemeteries without prior written permission from the Cemeteries Manager

(b) Any person committing an offence or in breach of the Regulations may also be liable on summary conviction to a fine not exceeding £100 and in the case of a continuing offence to a fine not exceeding £100 for each day during which the offence continues after conviction therefore under Article 19 of the London Local Authorities Cemeteries Order 1977.

PART VI - REPEAL

The foregoing Regulations shall have effect in substitution for the Rules and Regulations made the twenty-first day of June 1967 and any other Rules and Regulations relating to the same subject matter and heretofore made in relation to the Cemeteries.

The Council reserve to themselves the right to make any alteration or addition to the foregoing Rules and Regulations from time to time as may be found necessary or desirable.

APPENDIX THREE:

FEES AND CHARGES PROPOSED FOR 2007/08

CEMETERIES CHARGES 2007/08

ITEM	DESCRIPTION	CURRENT	PROPOSED FROM	% INCREASE	COMMENT
		£	£		N.B. Charges rounded to nearest pound
1.0	INTERMENTS				
	UNPURCHASED GRAVES (Includes cost of shared headstone, inscription and grass matting)				
1.1	Still-born and infants up to 30 days	112.00	118.00	5.36	Non-residents and residents are charged the same fee
1.2	Child up to 12 years				
	- resident	515.00	546.00	6.02	
	- non-resident	686.00	728.00	6.12	
1.3	Person exceeding 12 years				
	- resident	1,030.00	1,092.00	6.02	
	- non-resident	1,373.00	1,456.00	6.05	
	PRIVATE GRAVES (Includes grass matting)				
1.4	Still-born and infants up to 30 days	112.00	118.00	5.36	Non-residents and

					residents are charged the same fee
1.5	Child up to 12 years				
	- resident	515.00	546.00	6.02	
	- non-resident	686.00	728.00	6.12	
1.6	Person exceeding 12 years				
	- resident	1,030.00	1,092.00	6.02	
	- non-resident	1,373.00	1,456.00	6.05	
1.7	Grave longer than 2.06m (6'9") and/or wider than 0.74m (2'5")				
	- resident	1,290.00	1,367.00	5.97	
	- non-resident	1,720.00	1,823.00	5.99	
1.8	Additional fee outside 10am to 4pm Monday to Friday	145.00	154.00	6.21	
	24 hour burial notice	225.00	239.00	6.22	
1.9	INTERMENT OF CREMATED REMAINS				
	- resident	206.00	218.00	5.83	
	- non-resident	274.00	290.00	5.84	
1.10	Scattering of ashes				
	- resident	56.00	59.00	5.36	
	- non-resident	74.00	79.00	6.76	
2.0	PURCHASE OF GRAVES				
	GUNNERSBURY CEMETERY				
	SINGLE SPACE GRAVE				
	2.75m x 1.2m (9ft x 4ft) LARGE				
2.1	a. Pathside - resident	2,921.00	3,096.00	5.99	
	Purchase "in readiness"	4,382.00	4,644.00	5.98	
	Pathside - non-resident	3,895.00	4,128.00	5.98	
	Purchase "in readiness"	5,843.00	6,192.00	5.97	
2.2	b. Non-pathside - resident	2,050.00	2,173.00	6.00	
					NB: Purchase of graves "in readiness" incurs a 50% surcharge

	Purchase "in readiness"	3,075.00	3,260.00	6.02
	Non-pathsides - non-resident	2,733.00	2,897.00	6.00
	Purchase "in readiness"	4,099.00	4,346.00	6.03
	DOUBLE SPACE GRAVE			
	2.75m x 1.2m (9ft x 4ft) LARGE			
2.3	a. Pathside - resident	2,852.00	3,023.00	6.00
	Purchase "in readiness"	4,278.00	4,535.00	6.01
	Pathside - non-resident	3,803.00	4,031.00	6.00
	Purchase "in readiness"	5,704.00	6,047.00	6.01
2.4	b. Non-pathsides - resident	1,944.00	2,061.00	6.02
	Purchase "in readiness"	2,916.00	3,092.00	6.04
	Non-pathsides - non-resident	2,592.00	2,748.00	6.02
	Purchase "in readiness"	3,888.00	4,122.00	6.02
	TREBLE GRAVE SPACE			
	2.75m x 1.2m (9ft x 4ft) LARGE			
2.5	a. Pathside - resident	2,794.00	2,962.00	6.01
	Purchase "in readiness"	4,191.00	4,443.00	6.01
	Pathside - non-resident	3,725.00	3,949.00	6.01
	Purchase "in readiness"	5,588.00	5,924.00	6.01
2.6	b. Non-pathsides - resident	1,836.00	1,946.00	5.99
	Purchase "in readiness"	2,754.00	2,919.00	5.99
	Non-pathsides - non-resident	2,448.00	2,595.00	6.00
	Purchase "in readiness"	3,672.00	3,892.00	5.99
	SINGLE GRAVE SPACE			
	2.13m x 0.91m (7ft x 3ft) STANDARD			
2.7	a. Pathside - resident	1,641.00	1,740.00	6.03
	Purchase "in readiness"	2,461.00	2,610.00	6.05
	Pathside - non-resident	2,188.00	2,320.00	6.03
	Purchase "in readiness"	3,282.00	3,480.00	6.03
2.8	b. Non-pathsides - residents	1,231.00	1,305.00	6.01

	Purchase "in readiness"	1,846.00	1,958.00	6.07
	Non-pathsides - non-resident	1,641.00	1,740.00	6.03
	Purchase "in readiness"	2,462.00	2,610.00	6.01
	DOUBLE GRAVE SPACE			
	2.13m x 0.91m (7ft x 3ft) STANDARD			
2.9	a. Pathside - resident	1,556.00	1,649.00	5.98
	Purchase "in readiness"	2,334.00	2,474.00	6.00
	Pathside - non-resident	2,075.00	2,199.00	5.98
	Purchase "in readiness"	3,112.00	3,298.00	5.98
2.10	b. Non-pathsides - residents	1,167.00	1,237.00	6.00
	Purchase "in readiness"	1,750.00	1,856.00	6.06
	Non-pathsides - non-resident	1,556.00	1,650.00	6.04
	Purchase "in readiness"	2,334.00	2,475.00	6.04
	TREBLE GRAVE SPACE			
	2.13m x 0.91m (7ft x 3ft) STANDARD			
2.11	a. Pathside - resident	1,470.00	1,558.00	5.99
	Purchase "in readiness"	2,205.00	2,337.00	5.99
	Pathside - non-resident	1,960.00	2,077.00	5.97
	Purchase "in readiness"	2,940.00	3,116.00	5.99
2.12	b. Non-pathsides - residents	1,101.00	1,167.00	5.99
	Purchase "in readiness"	1,651.00	1,750.00	6.00
	Non-pathsides - non-resident	1,468.00	1,556.00	5.99
	Purchase "in readiness"	2,202.00	2,334.00	5.99
	SINGLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.13	a. Pathside - resident	1,272.00	1,348.00	5.97
	Purchase "in readiness"	1,908.00	2,022.00	5.97
	Pathside - non-resident	1,696.00	1,797.00	5.96
	Purchase "in readiness"	2,544.00	2,696.00	5.97
2.14	b. Non-pathsides - resident	864.00	916.00	6.02

	Purchase "in readiness"	1,296.00	1,374.00	6.02
	Non-pathsides - non-resident	1,152.00	1,221.00	5.99
	Purchase "in readiness"	1,728.00	1,832.00	6.02
	DOUBLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.15	a. Pathside - resident	1,205.00	1,277.00	5.98
	Purchase "in readiness"	1,808.00	1,916.00	5.97
	Pathside - non-resident	1,607.00	1,703.00	5.97
	Purchase "in readiness"	2,410.00	2,555.00	6.02
2.16	b. Non-pathsides - resident	819.00	868.00	5.98
	Purchase "in readiness"	1,228.00	1,302.00	6.03
	Non-pathsides - non-resident	1,092.00	1,157.00	5.95
	Purchase "in readiness"	1,638.00	1,736.00	5.98
	TREBLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.17	a. Pathside - resident	1,138.00	1,206.00	5.98
	Purchase "in readiness"	1,707.00	1,809.00	5.98
	Pathside - non-resident	1,517.00	1,608.00	6.00
	Purchase "in readiness"	2,275.00	2,412.00	6.02
2.18	b. Non-pathsides - resident	773.00	819.00	5.95
	Purchase "in readiness"	1,160.00	1,229.00	5.95
	Pathside - non-resident	1,031.00	1,092.00	5.92
	Purchase "in readiness"	1,547.00	1,638.00	5.88
	CREMATED REMAINS SECTION			
	0.67m x 0.67m (2ft x 2ft)			
2.19	- resident	347.00	368.00	6.05
	Purchase "in readiness"	520.00	552.00	6.15
	- non-resident	463.00	491.00	6.05
	Purchase "in readiness"	694.00	736.00	6.05

	HANWELL CEMETERY			
	SINGLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.20	a. Pathside - resident	615.00	652.00	6.02
	Purchase "in readiness"	922.00	978.00	6.07
	Pathside - non-resident	820.00	869.00	5.98
	Purchase "in readiness"	1,230.00	1,304.00	6.02
2.21	b. Non-pathsides - resident	491.00	520.00	5.91
	Purchase "in readiness"	736.00	780.00	5.98
	Non-pathsides - non-resident	654.00	693.00	5.96
	Purchase "in readiness"	981.00	1,040.00	6.01
	DOUBLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.22	a. Pathside - resident	583.00	618.00	6.00
	Purchase "in readiness"	875.00	927.00	5.94
	Pathside - non-resident	777.00	824.00	6.05
	Purchase "in readiness"	1,166.00	1,236.00	6.00
2.23	b. Non-pathsides - resident	470.00	498.00	5.96
	Purchase "in readiness"	705.00	747.00	5.96
	Non-pathsides - non-resident	627.00	664.00	5.90
	Purchase "in readiness"	940.00	996.00	5.96
	TREBLE GRAVE SPACE			
	2m x 0.75m (6ft 6ins x 2ft 6ins) SMALL			
2.24	a. Pathside - resident	552.00	585.00	5.98
	Purchase "in readiness"	828.00	878.00	6.04
	Pathside - non-resident	736.00	780.00	5.98
	Purchase "in readiness"	1,104.00	1,170.00	5.98
2.25	b. Non-pathsides - resident	442.00	469.00	6.11
	Purchase "in readiness"	663.00	703.00	6.03
	Non-pathsides - non-resident	589.00	625.00	6.11
	Purchase "in readiness"	883.00	937.00	6.12

	VAT INCLUDED FROM ITEMS 3.1 - 4.7				Non-residents and residents are charged the same fee
3.0	PRIVATE GRAVES Issue of permit to erect memorial				
3.1	CREMATED REMAINS - any height	74.00	78.00	5.41	
3.2	ALL GRAVE SIZES a. Any memorial on small/standard grave b. Any memorial on large/double grave	150.00 221.00	159.00 234.00	6.00 5.88	
3.3	Additions/alterations to existing masonry	74.00	78.00	5.41	
3.4	Additional inscriptions	42.00	45.00	7.14	
3.5	Inspection and staking of weak memorials	15.00	16.00	6.67	
3.6	Inspection and bonding of weak crosses	53.00	56.00	5.66	
3.7	Donated Benches	656.00	695.00	5.95	
4.0	GRAVE MAINTENANCE Planting and maintenance (Per annum) per grave space				A 10 year agreement may be entered into for fees 4.1 to 4.7, covering maintenance services. The charge is 12 times that of the annual fee to cover inflation and administrative costs.
4.1	Large/Double	241.00	255.00	5.81	
4.2	Standard	173.00	183.00	5.78	
4.3	Small	157.00	166.00	5.73	
	Washing of memorial (Per annum)				
4.4	Large/Double	88.00	93.00	5.68	
4.5	Standard/Small	57.00	60.00	5.26	

	Garden of Remembrance			
4.6	Planting (twice per annum)	78.00	83.00	6.41
4.7	Washing of memorial (per annum)	29.00	31.00	6.90
5.0	REMOVAL AND REPLACEMENT OF MONUMENTS AND GRAVESTONES			
5.1	SMALL/STANDARD			
	a. Headstone up to 0.76m - 1.07m(2' 6" - 3'6") high	210.00	223.00	6.19
	b. Full memorial up to 0.76m - 1.07m (2'6" - 3'6") high	418.00	443.00	5.98
5.2	LARGE/DOUBLE			
	a. Headstone up to 0.76m - 1.07m (2'6" - 3'6") high	281.00	298.00	6.05
	b. Full memorial up to 0.76m - 1.07m (2'6" - 3'6") high	562.00	596.00	6.05
6.0	MISCELLANEOUS FEES			
6.1	Registering change of ownership & new Deed	67.00	71.00	5.97
6.2	Replacement Deed of Grant only	39.00	41.00	5.13
	EXHUMATIONS			
6.3	a. Coffins	2,463.00	2,611.00	6.01
6.4	b. Ashes	247.00	262.00	6.07
6.5	Lift and re-level memorial	60.00	64.00	6.67
6.6	Turfing	67.00	71.00	5.97
	SEARCHES OF REGISTERS			
6.7	a. Per year searched	20.00	21.00	5.00
6.8	b. Certified copy of entry	13.00	14.00	7.69
7.0	CHAPEL FEE			
7.1	Monday - Friday 10am to 4pm (1 hour)	67.00	71.00	5.97
7.2	Monday - Friday (Outside normal hours)	Negotiable	Negotiable	
7.3	Officer attendance (Per hour at weekends)	Negotiable	Negotiable	

