

**KEY**

	Application boundary
	Footpath
	BW # Bridleway
	BOAT # Byway Open to All Traffic

	View from footpath/track/bridleway		View from property/settlement
	View from road		Open view
			Partial view
			Glimpse
			No view

**Methodology:**

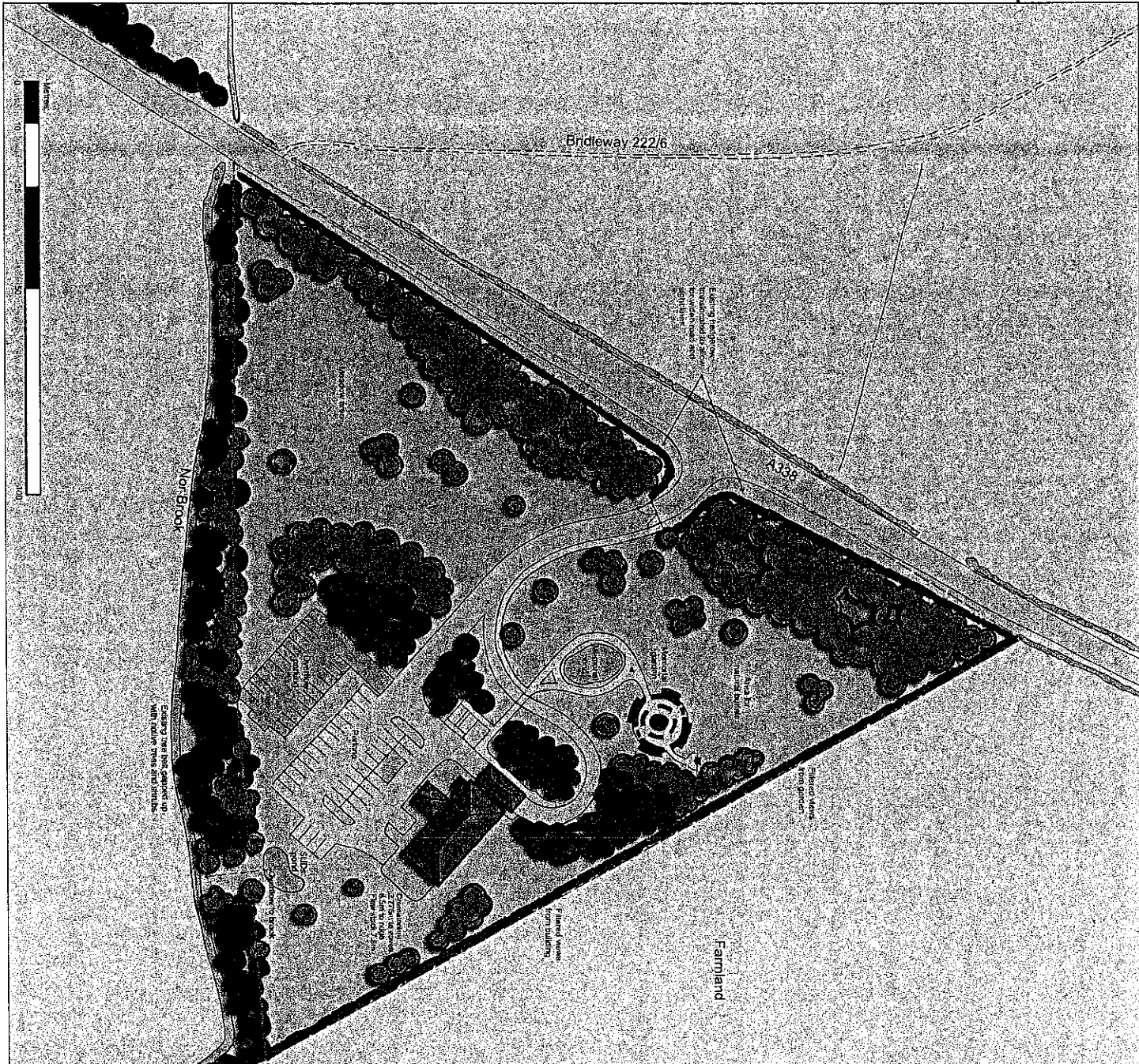
The visual assessment is based on a grading of degrees of visibility from a visual inspection of the site and surrounding areas. There is, in any visual assessment, a continuity of degrees of visibility, from not visible, to fully open in views. To indicate the degree of visibility of the site from any location, that continuum has been divided into four categories:

1. Open view: a clear view of a significant proportion of the site within the wider landscape;
2. Partial view: a clear view of part of the site, a partial view of it, or a distant view of the wider view, forms a relatively small proportion of the wider view;
3. Glimpse: a transient view, or a distant view of part of the site in the context of the wider landscape;
4. No view: no view, or difficult to perceive.

CLIENT: Memofa  
 PROJECT: Vale of White Horse Crematorium  
 TITLE: Visibility of Proposed Crematorium Building, One Year After Completion  
 SCALE: A7AS  
 DATE: January 2010  
 506.03 / 10 **HDA 5**

hda  
 Landscape Architecture  
 Masterplanning  
 Ecology

hda  
 hda  
 hda



**KEY**

- SITE BOUNDARY
- EXISTING TREES
- EXISTING HEDGEROWS / SCRUB

**TREE PLANTING**

- 1. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 2. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 3. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 4. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 5. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 6. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 7. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 8. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 9. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 10. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m
- 11. *Species: acer* Common Name: Acer (Sycamore) Age: 4-6m / 200-300cm Height: 10-15m Spread: 10-15m

Species and likely standards, shown at a minimum of 2m centres depending on species and canopy size. Adjacent to the building and towards the western boundary for some date visual effect.

Features and white planting throughout the site at 1.5m centres, overlaid with a 5m offset grid.

Species	Common Name	Form	Age	Height	Planting	Planting
1	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
2	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
3	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
4	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
5	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
6	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
7	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
8	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
9	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
10	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar
11	Acer (Sycamore)	Standard (Spindle)	2x	200-250	Ballbar	Ballbar

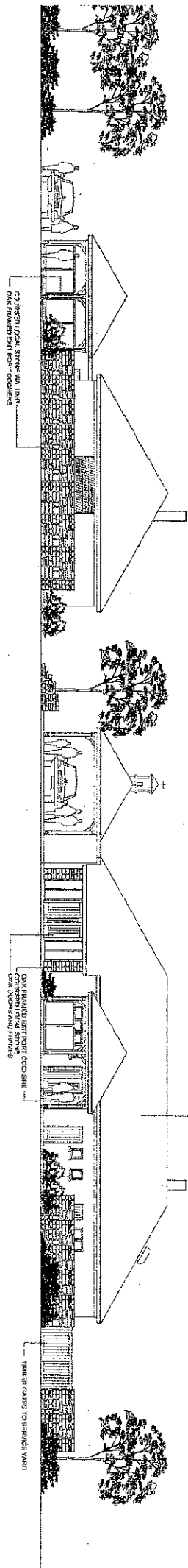
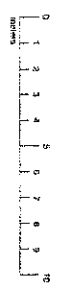
- UNDERSTOREY  
Shade and other vibrant grasses, sedges, meadow grasses
- HEDGEROW PLANTING  
Shade and other vibrant grasses, sedges, meadow grasses

- SHADE TOLERANT MULTI-LAYER MEADOW GRASSES
- REINFORCED GRASS (for Highways or similar) for surface parking
- COMPACTED GRAVEL/PAN
- POND

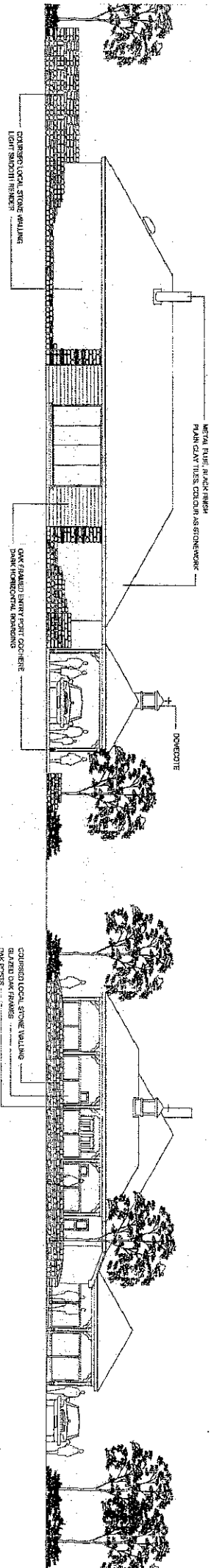
Species to be used in all of the parks to groups to allow management. Species to be used in all of the parks to groups to allow management. Species to be used in all of the parks to groups to allow management.

**CLIENT:** Memoria  
**PROJECT:** Vale of White Horse Crematorium  
**TITLE:** Illustrative masterplan  
**SCALE:** 1:1,000  
**DATE:** May 2011  
**HDA 4**

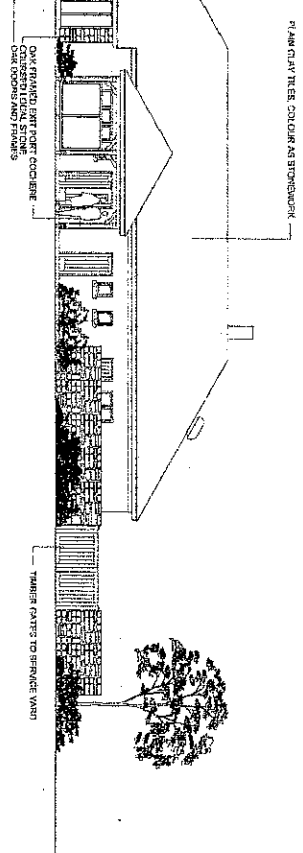
Landscape Architecture  
 Masterplanning  
 Ecology  
 3 Bankfoot, Bankfoot Road, Bankfoot, Dundee, DD10 6BA  
 01307 888755 or 01307 888756 or 01307 888757 or 01307 888758  
 www.hda.co.uk



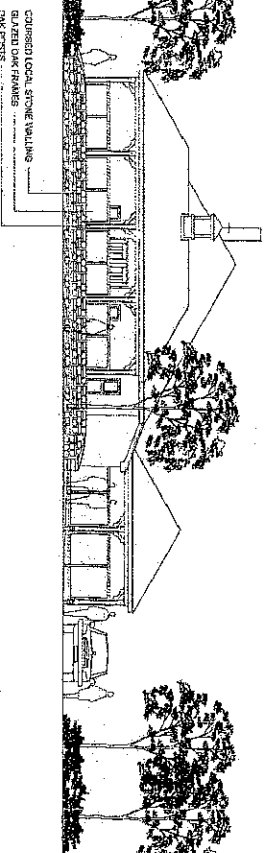
south east elevation



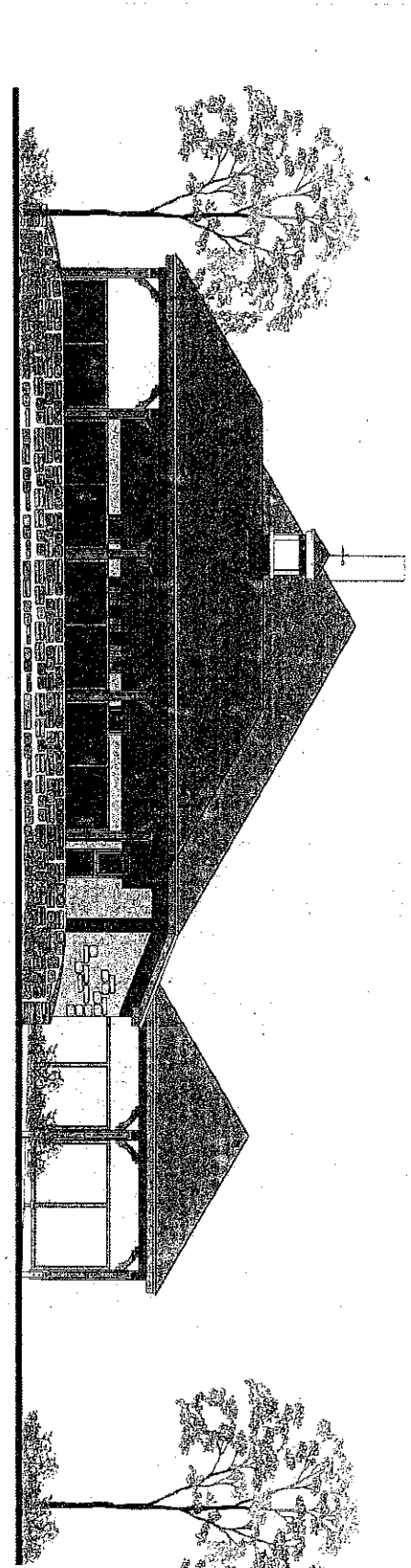
north east elevation



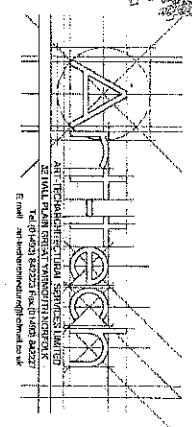
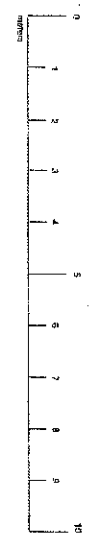
south west elevation



north west elevation



north west elevation



ARCHITECTURAL SERVICES LIMITED  
 21, LITTLE PLAIN GREAT YARNDEN STREET, LONDON  
 E-mail: info@architectural-services.co.uk

CLIENT	MEDAZONA LTD
PROJECT	VALE OF WAVER HOUSE, FERRIS CHAM
DRAWING	ELEVATIONS
SCALE	1/100
DATE	DEC 2010
DRAWN	PB

1264-02



**Garford Parish Meeting  
4 Dairy Meadow, Garford OX13 5PH**

Mr Martin Deans  
Planning Services  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon  
OX14 3JE

29th July 2011

Dear Mr Deans,

**Planning Application GAR/21615 – Erection of new crematorium together with associated works**

On 4<sup>th</sup> July, a public meeting was held in Garford village hall, the purpose of which was to solicit the views of the residents with respect to the above planning application. Although not formally counted, the number of attendees was unprecedented, estimated to be in excess of sixty. Councillors Matthew Barber and Iain Brown also kindly attended.

The unanimous view of the meeting was that of objection to the above proposal. Attachments A, B and C provide details of the concerns raised by the proposal and its supporting documentation. The following is a précis of those concerns:

**1. Conflict with fundamental planning policies at both local and central government level (Attachment A)**

1.1 Planning Policy Statement (PPS) 1 - The proposal is contrary to requirements for sustainable development as set out in aforementioned PPS in that this development will encourage additional travel by car as opposed to reducing it. There are no realistic alternative means of travel to the location.

1.2 Planning Policy Statement (PPS) 7 – The proposal is contrary to the requirements of sustainable development in rural areas. The requirements for PPS 7 are that development in rural areas should be focused on or adjacent to existing urban areas.

1.3 The Vale of White Horse District Council Local Plan Inspectors Report (February 2006) – The Inspector's report stated that there was "...no need to allocate land for a new crematorium at Marcham or anywhere else in this plan". The report also states "should the situation change .... I am satisfied that the application of the criteria in Policy CF2, and other relevant plan policies, would enable an appropriate site search to be undertaken ..." Not only has there been a reduction in



crematorium usage since the aforementioned statement, there has been no site search carried out in accordance with the District Council's policies.

1.4 The Vale of White Horse Local Plan 2011 (June 2006) Policy CF2 - The proposed development is contrary to many aspects of the aforementioned policy in that it is in an unsustainable location and remote from any settlement or any existing buildings.

1.5 The Vale of White Horse local plan 2011 (June 2006) GS1 - The policy GS1 seeks to limit all development in open countryside. In exceptional circumstances the policy does permit some development, to meet local needs. However, there is no local need. A crematorium is designed to meet a regional (as opposed to parish or even district) need, significantly beyond the scope permitted by the aforementioned policy.

1.6 The Vale of White Horse District Council Statement of Community Involvement (SC1 2009) - There is a requirement by the Council for developers to consult widely in respect of major developments. This major planning application has not been the subject of any pre-application consultation with any stakeholders or community.

## **2. Concerns regarding increase of traffic in the locality and, in particular, accident rate on the A338**

The Transport Assessment document discusses an analysis of accidents occurring 500m in either direction of the proposed site over the recent three year period and concludes that "The introduction of the crematorium and technically sound access arrangement ... would not impact materially on the accidents that are likely to occur."

Both the analysis and the conclusion are flawed. The issue requiring consideration is whether the addition of junction 200m north of the blind bends at Venn Mill is likely to impact on the accident rate at this locality. A historical review of the accident rate at the locality of the site prior to the proposed development is irrelevant. The overwhelming majority of accidents occurring on the A338 take place at junctions. An analysis of the Personal Injury Accident (PIA) data for the A338 between Venn Mill and the A420 roundabout (source: Oxfordshire CC) for the past ten years shows that there have been 38 accidents involving 72 vehicles, with 66 casualties and 2 fatalities, almost all of which occurred at unmanaged junctions (Attachment B). The number of unreported accidents is likely to be considerably greater. It seems highly probable that the addition of a further, reasonably busy junction at this location would impact significantly on the accidents that are likely to occur, especially when drivers are feeling both reflective and under pressure to join or maintain a cortege.

### **3. Impact on the vista and the significant likely resulting harm to the countryside**

#### **3.1 Landscape Setting**

The proposed site is located in the Lowland Vale, an area made distinctive by its rural appearance of a patchwork of fields, farms and villages. The long views over the Lowland Vale from the Ridgeway are an essential part of the landscape quality of the district.

The design and landscaping of the proposed crematorium is completely out of keeping with the rest of the Lowland Vale, bringing a suburban landscape and an industrial building to a very rural setting. Both near and long views will be harmed should the development go ahead. This is contrary to Policy NE9 of the adopted Local Plan.

In the Cornish appeal decision submitted by the applicant, the Inspector acknowledged that by allowing a crematorium to be developed in open countryside, 'significant resulting harm to the countryside' would be caused. There is no compelling reason in this case why such harm needs to be caused to the most rural part of the Vale.

#### **3.2 Proximity to Venn Mill**

Venn Mill is a Grade 2 Listed Building originating back to the 16<sup>th</sup> Century. It is an important feature in the landscape and its distinctive isolated position makes it a local landmark.

The building of a structure so out of keeping, so close to its proximity, will have a detrimental effect on the setting of this Listed Building. The scale, design and landscaping of the proposed crematorium do not respect the setting of Venn Mill and is therefore contrary to Policy HE5.

### **4. Lack of rigour and substance with respect to the Needs Analysis and its speculative and non-inclusive nature (Attachment C contains a detailed review of this document).**

- The relatively superficial document entitled "Crematorium Needs Analysis" provides no conclusive evidence of either quantitative or qualitative needs, being based on statistical data including ONS projections, unsubstantiated assumptions and suppositions, and a cursory discussion of a canvassing exercise involving a small number of Undertakers. It is interesting to note that four of the five funeral director supporting contributions on the VoWH website, from different locations well outside the area (Carterton, Faringdon and Didcot), have identical wording.
- The claims of need are in direct contradiction with the views of the Independent Planning Inspector's 2006 report on the Vale of White Horse local plan (1.3 above), where both need and requirement to allocate land for a crematorium in the district is categorically rejected.



- No account has been taken of margins of error in respect of the Needs Analysis calculations, especially in view of the fact that it is based largely on ONS projections, which are extrapolations of historical data and not forecasts, and other questionable assumptions and suppositions.
- It seems inappropriate that the Needs Analysis was drafted for and on behalf of the developer, without the engagement, or even the consultation, of the local Council, as is required by the Local Development Framework (LDF) document, and seems, as such, commercially speculative.
- The applicant has attempted to establish parallels with the crematorium development at Treswithian Downs in Cornwall. However, this application shares none of the fundamental arguments that supported Treswithian Downs, in particular:
  - The need in Cornwall was both acute and undisputed
  - A population growth of 20 – 35% was forecast for the area
  - The peninsular land geography, widely dispersed population, and demographics are completely different to that of the Vale of White Horse
- Despite all the supporting arguments of the Treswithian Downs development, "...significant resulting harm to the countryside..." was acknowledged by the Independent Planning Inspector who eventually allowed the appeal.

**5. Lack of rigour and substance with respect to Site Selection process and its non-inclusive nature (Attachment C)**

- It seems inappropriate that the site selection process has been conducted without the engagement, or even the consultation, of the local Council, as is required by the LDF. It seem most unlikely that an impartial and exhaustive investigation carried out with sufficient rigour and depth and in association with the local Council would have drawn the same conclusions, and furthermore probable that the proposed site has been summarily selected due to its availability and low cost
- Other than its availability and low cost, the land selected has little to recommend it as a site for a new crematorium, not least of all:
  - Access, especially by public transport
  - Close proximity to a busy main road, with contemplative garden areas immediately adjacent to the A338
  - Disregard for the views of the local Highways Officer
  - Size; despite the claims of the application documents, the site is barely large enough for a crematorium, by the applicant's own definition

## 6. Validity of statements made in the Transport Assessment (Attachment C)

- The conclusion that the proposal would reduce car borne traffic and distances travelled, and is therefore a sustainable development, is fundamentally flawed in that most mourners do not travel from the location of the Undertaker, only the immediate family do so in most cases. Most other vehicles arrive from locations randomly dispersed around the UK, as is well known by anyone who has attended funerals. The overall effect on distances travelled per service would be negligible.
- The assumption regarding car sharing does not stand up to scrutiny, even by the applicant's own data.
- Again, the views of the local Highways Officer have been cavalierly disregarded.

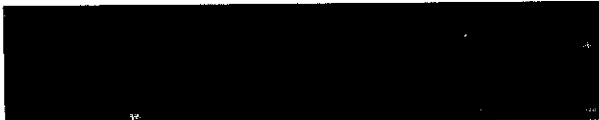
Given the above, it seems most likely that the documentation supporting this application is not the balanced conclusion of rigorous, impartial research and analysis, but has been selectively drafted with the express aim of justifying a pre-determined outcome.

For the reasons given above, Garford Village Meeting would respectfully urge Vale of White Horse District Council to refuse this application.

Yours sincerely,



A B Carter (Chairman)



D Heugold (Clerk)

3 enclosures

## Attachment A

Ref: 11/01281/FUL - GARFORD CREMATORIUM SITE

### Location

We consider the location of the proposed development to be completely inappropriate. As referred to in Para.4.4 of the Planning Statement submitted with the application, Planning Policy Statement (PPS) 1: Sustainable Development states that development should be encouraged that reduces the need to travel by private car.

PPS7: Sustainable Development in Rural Areas states that development should be focused in or adjacent to existing urban areas (see Para.4.5 of Planning Statement).

The application site is in a remote location, approximately 5km from the nearest town of Abingdon and approximately 8km from Wantage. We consider that locating the development adjacent to the built-up area of Abingdon or Wantage would be a much more appropriate location, making it far more accessible, particularly by modes of transport other than the private car.

We disagree with the applicant's assertion in Para.4.10 of the Planning Statement that there is a clear and justified need for a setting remote from the built-up area. It is possible to create a pleasant setting for such a facility on the edge of a built-up area with appropriate landscaping as proven at Oxford Crematorium, which is adjacent to the built-up area.

### Open Countryside

The site is in the open countryside. The Vale of White Horse Local Plan 2011 (June 2006) states (Policy CF2):

*'Development which is proposed in connection with the provision of new services and facilities for the social well-being of local communities, including extensions to and changes in the use of existing buildings, will be permitted where the following criteria are met:*

- i) the proposal conforms with the general policies for development in the plan and in particular maximises as far as is possible access for all;*
- ii) any proposal for a new building is within the built-up area of a settlement or within or adjacent to a group of existing buildings providing for such uses and is not within the Green Belt outside a village area defined in Policy GS3 or outside a major developed site defined in Policy GS4;*
- iii) any extension will not have an adverse effect on the character or setting of the existing building or its surroundings, or significantly alter the character and scale of the existing activity so as to cause harm to the local environment; and*

*Exceptionally, development of a small scale community facility adjacent to the built-up area of a settlement will be permitted:*

- a) where it meets a clearly identified local need that cannot be met in any other way; and*
- b) it is not within the Green Belt outside a village area defined in Policy GS3.'*

As stated above, the location of the development clearly does not comply with point (i) of Policy CF2 in that it is in an unsustainable location. The site is remote from any settlement or any existing buildings and therefore does not comply with point (ii). The development will also significantly alter the character of the location environment by building on a relatively flat, open greenfield site.

Policy CF2 also states that there are exceptional circumstances where such a facility may be permitted adjacent to the built-up area of a settlement. However, this site is not adjacent to a settlement.

Additionally, the Local Plan Inspectors Report (February 2006) states "*I see no need to allocate land for a new crematorium at Marcham or anywhere else in this plan. Should this situation change in the near future I am satisfied that the application of the criteria in Policy CF2, and other relevant plan policies, would enable an appropriate site search to be undertaken....*" Demand would appear to have decreased since this statement, so there is no clear need for this development.

Policy GS1 seeks to limit all development in the open countryside. In exceptional circumstances some development may be allowed to meet local needs. However, the crematorium is designed to meet the needs of a wide catchment area, not just the needs of Garford Parish.

#### **Assessment of Alternative Sites**

The Planning Statement submitted with the application includes an assessment of a number of alternative sites. Most of these sites were in similarly remote locations to the preferred option and were therefore unlikely to be viewed as any more desirable.

The exception is the site off Marcham Road (Site 3), which is closer to the built-up area of Abingdon. It appears that this was ruled out due to the landowner's unwillingness to sell the land. However, there is no evidence that other landowners in the vicinity were also approached and none of the sites considered were adjacent to Wantage, the second largest town in the District and expected to grow significantly in the next 15 years.

#### **Ecology**

We note that the Phase One Habitat Survey was inconclusive regarding the presence of water vole, but that there was habitat potentially suitable for water vole on the site. We consider that a detailed survey should be carried out before the application is determined. Indeed, we consider that the applicant should have ensured this survey was completed prior to the application being registered.

#### **Public Consultation**

The District Council's Statement of Community Involvement (SCI, December 2009) states: '*Where appropriate for major applications, the Council will advise developers to consult more widely by letter, leaflet or newsletter or hold a public exhibition of their proposal. They could consider involving not just individual residents but town and parish councils, local amenity groups and resident's organisations.*' (Para.6.24).

This major planning application has not been the subject of any pre-application consultation as far as we are aware. No Statement of Community Consultation has been submitted with the application and the applicant has not contacted the Parish Council prior to submission, let alone the residents of Garford.

The application has ignored the requirements of the Council's SCI and there has been no opportunity for the design of the proposal to be improved through what should be an iterative process.

## Attachment B

Source – Oxfordshire CC Traffmap Accident Analysis System

Analysis of road accident data in last 10 years on A338 between Venn Mill and A420 roundabout.

Note: Personal Injury Accident data only. The number of unreported accidents is likely to be significantly greater.

### Venn Mill A338

No of accidents	4
No of vehicles	5
No of casualties	6
Inc fatalities	0

### Tubney/Frilford staggered junction with A338

No of accidents	12
No of vehicles	25
No of casualties	21
Inc fatalities	0

### Garford junction with A338

No of accidents	11
No of vehicles	24
No of casualties	18
Inc fatalities	2

### A338/A420 roundabout

No of accidents	6
No of vehicles	9
No of casualties	12
Inc fatalities	0

### A338/A415 junction

No of accidents	1
No of vehicles	2
No of casualties	3
Inc fatalities	0

### Others A338 near roundabout

No of accidents	4
No of vehicles	7
No of casualties	6
Inc fatalities	0

### TOTAL

No of accidents	38
No of vehicles	72
No of casualties	66
Inc fatalities	2

## Attachment C

### Planning Application GAR/21615 - Erection of new crematorium together with associated works.

#### Critical review of Planning Statement and Needs Analysis

##### Scope

This document examines and comments on the validity of statements and claims contained in both the Planning Statement and the Needs Analysis documents with respect to both the establishment of need and the site selection process for the above planning application. The Transport Assessment is also commented on.

#### 1 Analysis of Need

- 1.1 The Planning Statement states "This application has arisen out of recognition by crematoria operators, local funeral directors, Clergy and the local authority that there is need to make provision for a crematorium in the locality".
  - 1.1.1 The only crematorium operator known to acknowledge this recognition is the applicant, Memoria Ltd. It is disputed by others (ref. Contributor Dignity.pdf). Given the commercial considerations, this is hardly surprising on both counts.
  - 1.1.2 Paragraphs 5.17 – 5.20 contain a relatively vague discussion of a canvassing exercise of only 13 funeral directors from both within and outside the district. It should be noted that their reaction was driven by both service cost and the condition of the chapel at Swindon, as much as anything else, and in no respect do these reactions confirm a material need for an additional facility.
  - 1.1.3 No evidence is provided with respect to the purported view of Clergy.
  - 1.1.4 Crucially, no evidence is provided with respect to the purported expression of need by the local authority. At a recent public Parish Meeting, local councillors Matthew Barber and Iain Brown indicated that this application had come as a complete surprise. It is inappropriate for facilities such as this to be considered through speculative proposals. Location and need should be established through a rigorous and inclusive process of engagement and consultation with the local Council, stakeholders and members of the public. Indeed, the proposed Local Development Framework (LDF) policy document, para 6.26, states "Through the LDF the Council has an important role to coordinate development with the services it requires, ...The Council will work with organisations to establish the services needed for the future, and where possible identify the land". There is no evidence of the role or even of the consultation of the Council in either the establishment of need or the identification of land. Furthermore, this statement is in direct contradiction to the Independent Planning Inspector's 2006 report on the Vale of White Horse Local Plan, where he comments: "...Marcham is not very well related to either [Wantage or Faringdon] and there is no current evidence of any overall lack of crematorium facilities serving the district. Consequently, I see no need to allocate land for a new crematorium at Marcham or anywhere else in this plan. Should this situation change in the near future, I am satisfied that the application of the criteria in policy CF2, and other relevant plan policies, would



enable an appropriate site search to be undertaken in accordance with the principles of sustainability." Note: It would seem that the only material change to have occurred since the drafting of the Planning Inspector's report is the decrease in utilisation of the crematoria at both Oxford and Swindon (see below).

1.2 The document entitled "Vale of White Horse Crematorium Needs Analysis" states that the analysis was taken from commission to final report in November 2010 (i.e. one month maximum). By definition, this implies that the research carried out was relatively superficial. Its findings are based on two sources of statistical data, these being:

- a) ONS projections for both population growth and death rates within the identified "catchment area" and,
- b) A drive time analysis, based on statistical isochronal data.

In addition, it relies on "...a number of areas of information provided by the client [i.e. the applicant] ..." for which the report admits that they "...have not undertaken additional verification..."

Note: ONS projections are statistics based on historical data and are not forecasts, an important distinction that the ONS are anxious to stress. The use of statistical projections without the application of a predictive forecasting model is simplistic and likely to result in substantial margins of error.

1.2.1 The conclusions of the report are also based on the following speculative assumptions and suppositions:

- a) Population growth within the locality will grow in accordance with ONS statistics over the next quarter of a century.
- b) An ageing population in the same period implies that death rates are likely to increase. (In fact, an ageing population implies that death rates remain constant with improving health and medical care, i.e. the mean age of death increases.) Note: The number of actual deaths in the identified "catchment area" decreased by 0.08% from 2004 – 2009 (ref ONS data with "catchment area" proportions applied). Also, ONS statistical data projects no significant rise in death rate over the next ten years and a rise over the next quarter century of only one part per thousand, a negligible increase with respect to the identified catchment population.
- c) The proposed usage figures depend on attracting 100% of the population in the proposed "catchment area". This is also "...deemed to be a conservative estimates (sic)..." (ref para 4.6).

1.2.2 No account has been taken of the error margins associated with either the use of statistical projections or the assumptions made. Such errors multiply when statistical and other uncertain data are compounded, as in this case, such that two probabilities having a confidence of, say, 75% (i.e. quite good) when used in an "AND" conjunction (e.g. as opposed to "OR"), end up with a certainty of little more than 50%, i.e. little better than the flip of a coin. In this case, the needs analysis relies on a large number of assumptions all conjoined by "AND" (Projected population increase; Projected population mean age; Assumed death rate increase; Assumed catchment population based on drive time analysis; Assumed increase in cremation rate). Small

error margins of only 10% in each of these factors reduce the confidence level of the predicted outcome significantly.

- 1.2.3 The Needs Analysis relies on 2007/2008 crematorium usage figures to justify a conclusion that there is a "growing demand for cremations in the area". This is a material misstatement, derived from selected data, since analysis of the wider, five year data set, 2005–2009, clearly identifies a significant decrease in crematorium usage both at both Oxford and Swindon (11% and 5% respectively).
- 1.2.4 Para 4.11 of the Planning Statement states "The need for the development has arisen through an assessment of local crematoria services which are over capacity". The actual data (1.2.3 above) does not support this claim.
- 1.3 Examination of the tables presented in section 3 of the Needs Analysis document show that, when ONS data is applied, the population across the whole proposed catchment area will increase by 13,645 (7%) by 2021. Applying the projected death rates to this figure shows that the number of deaths across the whole proposed catchment area will increase by only 160 by 2021. Considering that other forms of funeral will also be adopted, so that only a proportion of that number will be cremated, this small increase does not justify the provision of a new green field site crematorium, particularly in view of the current trend of falling crematorium usage, as shown in 1.2.3 (above). It is worth noting that cremations currently account for 70% of funerals in the UK, but with the high energy and hence CO2 demands of cremation, and the consequent growing popularity of "green burials", this proportion is likely to reduce considerably with time (ref Ministry of Justice document – Telegraph; 11 Jan 2010).
- 1.4 There is no evidence in either the Planning Statement or the Needs Analysis indicating a material need, i.e. a need based on demand, for an additional crematorium in the Vale of White Horse. Should such a need be perceived, a consultative and inclusive approach to substantiating the need, such as is required by the LDF, through a detailed analysis of all relevant data and evidence, with comprehensive and exhaustive statistical and root cause analysis, should be made in conjunction with the Council. The presentation of data carefully selected to support a desired outcome together with other assumptions and suppositions does not constitute an investigation of sufficient rigour and depth to support such a sensitive and potentially controversial planning proposal, contravening many policies of both the Vale of White Horse Local Plan 2011 and the Parish Plan.
- 1.5 The applicant appears eager to correlate this application with that of the Treswithian Downs crematorium at Camborne, Cornwall. Many of the arguments, and indeed much of the wording used in the appeal decision report, have been adopted by the applicant. However, this application differs significantly in many respects:
  - 1.5.1 The most compelling argument for the Treswithian Downs application was both the peninsular geography of the territory coupled with a widely dispersed rural population.
  - 1.5.2 The need was undisputed.
  - 1.5.3 Nationally, Cornwall has one of the lowest levels of crematoria by area.

- 1.5.4 Due to the RSS, a population increase of between 20 and 35% is anticipated in Cornwall, coupled with increasing death rates and a projected 20% increase in demand at existing crematoria. This compares with a projected 7% increase in population in the proposed Vale of White Horse "catchment area", static death rates, and falling utilisation of existing crematoria.
- 1.5.5 The current trend shows a significant increase in utilisation of the Cornish crematoria. It appears to have been undisputed that existing crematoria were "at maximum capacity and unable to deal ... with existing demand"
- 1.5.6 The Cornish site is located a few hundred metres from the main A30 trunk road, making it easily accessible from a major highway with no congestion or safety concerns and no significant use of minor roads.
- 1.5.7 It is worth noting that, despite the arguments supporting the Cornish development that led to the appeal being allowed, significant resulting harm to the countryside was acknowledged by the Independent Planning Inspector.

## 2 Site Selection

- 2.1 Section 5G of the Planning Statement (paras 5.21 – 5.24) discusses a number of alternative sites that, it states, were considered and assessed prior to selecting the preferred location.
- 2.2 No description of the process adopted for the selection of potential sites for evaluation is provided. An explanation of this process is critical in demonstrating that sufficient rigour has been used in selecting the most suitable site, especially in view of the sensitive and potentially controversial nature of the proposal.
- 2.3 Given that four of the six "alternatives" were discounted because the landowner was unwilling to sell and that the other two, nearly adjacent, sites were discounted on grounds of their openness coupled with highway considerations, this does not appear to be the result of a rigorous and exhaustive process. In fact, it has the appearance of a token gesture by way of demonstrating that some sort of site selection process took place. There is no evidence of compliance with the LDF policy document (para 6.26) (above) with respect to the role of the Council in this process.
- 2.4 Para 5.23 states "...land immediately adjacent to existing settlements and main conurbations are (sic) likely to be of a much higher value... Identifying such sites to locate a crematorium is therefore not possible because the existing land value makes the use of those sites uneconomical. To this end agricultural land is favoured...". The clear inference of this statement is that a significant factor in the selection of the site is that it is inexpensive for the developer and is therefore a profit driven consideration. Private enterprise profit is unlikely to be an acceptable justification for contravening both central and local government development plans with respect to development of green field sites. Furthermore, dismissing consideration of land adjacent to main conurbations denies, both now and for the future, the possibility of use of an energy recovery system to mitigate the high energy consumption and carbon footprint of the cremation process. The proposed thermal recovery system for heating the chapel will use only a negligible proportion of the energy available through recovery and this is therefore a weak argument with

respect to the sustainability of the development. Note: Average energy consumed per cremation is 300kWh. On the basis of the projections provided, the annual energy requirements of the proposed crematorium are equivalent to that of heating more than twenty five average homes. A high proportion of this could be recovered and used to heat local amenities, as has already been demonstrated in completed projects in other parts of the country. Otherwise, around 280kWh of recoverable energy per cremation will simply be discharged to the atmosphere.

- 2.5 No reason for the unwillingness of alternative landowners to sell is given. However, the site actually selected is less than half the size of any of the alternatives discussed in the selection process. (It also barely meets, if at all, the minimum size criteria for a crematorium, as stated in the application document – see 2.6d below). Undue focus on commercial cost seems likely to have been the main consideration in the selection of the site.
- 2.6 In general terms, other than the likelihood that the site was summarily selected for the simple reasons that a) the landowner was willing to sell and, b) the land is relatively cheap, it appears to have little to recommend it as a site for a new crematorium. In particular:
- a) Proposed access is via a new, unmanaged junction off a narrow and notoriously busy and dangerous single carriageway A road.
  - b) Whilst the site technically meets the requirements of the Cremation Act 1902, with respect to the constraint that “No crematorium shall be constructed ... within fifty yards of any public highway”, with the building being only ninety metres from the busy A338 this will not provide a tranquil atmosphere, especially since the gardens and other quiet, contemplative areas are immediately adjacent to the road. (It is noted that most crematoria known to the authors are situated a considerable distance from main roads.)
  - c) DoE guidelines suggest that “...a piece of ground with natural undulations ... with easy access by public transport...”. This proposal meets neither consideration.
  - d) Planning Statement para 1.7 states “... there are a number of key requirements that need to be met in order for a site to be considered suitable for crematorium use. The site itself should extend to a minimum of two hectares...” Whilst both para 2.1 of the Planning Statement and the Planning Application Form itself state that the site is approximately 3.8ha, it is, in fact, barely 2ha, as a simple trigonometric exercise confirms. When studied on an independent map (i.e. not that provided by the applicant), it is not at all clear that it does actually extend to fully 2ha. Whether this is adequate for memorial gardens and quiet contemplative areas is debateable, especially in view of it's proximity to the A338. Note: For comparison, this is approximately quarter of the size of Oxford crematorium.
  - e) Views of the Highways Officer both that the proposed site is not conducive to modes of transport other than the private car and that the existing bus service is inadequate and restrictive (ref Transport Assessment).
  - f) Access to the locality is via a tortuous route from any direction, be it the A415 from Witney, the A420 and A338 from Oxford, the A415 through Marcham from Abingdon, or via Wantage and the A338 from the south.
  - g) The proposal does not attempt to address a number of areas of National Planning Policy:

i. PPS1

- Effective protection and enhancement of the environment
- Prudent use of natural resources
- Addressing the causes and potential impacts of climate change through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car)

ii. PPS7

- Discourage development of "greenfield" land, and, where such land must be used, ensure it is not used wastefully.
- New building development in the open countryside away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled; the Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all, and;
- Priority should be given to the re-use of previously developed ('brownfield') sites in preference to the development of greenfield sites, except in cases where there are no brownfield sites available, or these brownfield sites perform so poorly in terms of sustainability considerations (for example, in their remoteness from settlements and services) in comparison with greenfield sites.

iii. PPG13

- Reduce the need to travel, especially by car.
- Where a development comprising jobs, shopping, leisure and services is proposed outside the preferred locations identified in the development plan, the onus will be on the developer to demonstrate why it cannot fit into the preferred locations, and to illustrate how the accessibility of the proposed development by all modes compares with other possible sites.

**3 Other issues**

- 3.1 It is worth commenting on some of the pivotal statements of the Transport Assessment.
- 3.2 It is clear that the Highways Officer felt that the location is not ideal, not being conducive to modes of transport other than private car. This was disagreed with by the author of the Assessment.
- 3.3 It is stated that the introduction of a ghost lane right turn junction would not impact materially on the likelihood of accident occurrence. Most accidents occurring on the A338 occur at junctions. This will be especially so when drivers are feeling both reflective and under pressure to join or maintain a cortege.

- 3.4 The Transport Assessment attempts to demonstrate that the proposal would REDUCE car borne traffic and distances travelled, thereby being a sustainable development. The following claims are made:
- 3.4.1 "... mourners usually rally round and car share with relatives and friends. As such, car occupancy levels are high". The data given in the same Transport Assessment from the observations made concludes that, on average, 600 people arrived in 280 vehicles, an average of 2.1 passengers per car. Given that hearses usually contain 4 or more people, it seems reasonable to conclude that each private car contained only 1 or 2 occupants.
- 3.4.2 "...it can be shown that the introduction of a crematorium in this location would result in a significant reduction in car travel." The Assessment goes on to provide a calculation indicating that 320,000km could be saved each year. This simplistic analysis is based on the assumption that ALL mourners will be travelling from the location of the undertaker. In reality, it is most likely that only the immediate family will be travelling from this location, the overwhelming majority of mourners' cars arriving from locations randomly dispersed around the country. The location of the crematorium will have little effect on the overall distance travelled per service and does not therefore constitute a sustainability argument for the proposal or provide evidence of compliance with relevant Government directives.
- 3.4.3 The Planning Statement relies for its justification of Environmental Benefits on both the above argument (3.4.2 above) and the assumption that the proposed new cremator would be less polluting than current existing ones. It fails to acknowledge the fact that optimum efficiency of cremators is achieved with high utilisation due to minimisation of warm-up cycles. Reduced utilisation, brought about by, for example, unnecessary competition, requires increased use of fuel due to equipment cooling between cremations. In any case, the same standards for flue emissions will be applicable to ALL cremators by 2020 (ref DEFRA). Note: Oxford crematorium is currently being upgraded to meet the latest DEFRA requirements for flue gas emissions as would be applied to any new equipment.
- 3.4.4 The Transport Assessment also disagrees with the Highway Authority's view that the existing bus service is restrictive and inadequate. In addition to 3.2 (above), such disregard for the views of the local Highways Authority could be viewed as a demonstration of both a cavalier attitude in the preparation of the Transport Assessment arguments and a lack of appreciation of the importance of local knowledge.

#### **4 Conclusions**

- 4.1 The quantitative needs analysis presented relies on twenty five year projections provided by ONS, a drive time analysis based on isochronal data, dubious assumptions regarding death rate which are not supported either by the ONS projections or current trends, and crematorium utilisation figures which appear to have been exclusively selected to support a required conclusion and therefore represent material misstatements. No conclusive evidence of quantitative need, based on current trend analysis or anything else, is provided.

- 4.2 No account of the error margins associated with the use of long term statistical projections, together with other assumptions, has been taken into consideration.
- 4.3 The qualitative needs statements are based on unsubstantiated claims and a vague discussion of a canvassing exercise of a small number of undertakers. They directly contradict the 2006 Independent Planning Inspector's report on the Vale of White Horse Local Plan.
- 4.4 It would appear that the Local Council have not been engaged, or even consulted, with respect to either the needs analysis or the site selection processes, a defined requirement of the LDF document. The site selection process appears to lack reasonable rigour and seems to have been conducted as a token gesture in support of a pre-determined conclusion.
- 4.5 Correlation of this application with that of the Treswithian Downs crematorium application is implied. However, the applications differ significantly in many respects, including; Undisputed need in Cornwall; Geography and demographics; Projected population increase in Cornwall being up to five times higher than that in the catchment area proposed here; Cornish site located a few hundred metres from a main trunk road. Yet, despite all the supporting arguments, significant resulting harm to the countryside was acknowledged by the Independent Planning Inspector who eventually allowed the appeal.
- 4.6 Cost appears to have been a significant consideration in the selection of the proposed site. There are numerous factors for which the proposed location is unsuitable for the site of a new crematorium, including access, tranquillity, size, compliance with central and local government planning policies and DoE guidelines. The views of the local Highways Officer have also been cavalierly disregarded. It seems most unlikely that an impartial and exhaustive investigation carried out with sufficient rigour and in association with the local Council and other stakeholders would have drawn the same conclusions and, furthermore, probable that the proposed site has been summarily selected due to its availability and low cost.
- 4.7 The statements provided regarding sustainability do not appear to stand up to scrutiny, including the calculated number of private car miles saved, suggested car occupancy rates and pollution reduction with the introduction of a new cremator.
- 4.8 Overall, the investigations appear to have been commissioned and conducted with the express aim of supporting a required and pre-determined outcome.



**Garford Parish Meeting  
4 Dairy Meadow, Garford OX13 5PH**

Mr Martin Deans  
Planning Services  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon  
OX14 3JE

5<sup>th</sup> December 2011

Dear Mr Deans,

**Planning Application 11/02453/FUL – Erection of new crematorium together with associated works**

Please find enclosed the Garford Parish Response Form with associated documents.

Our previous letter and its attachments, dated 29<sup>th</sup> July 2011, as submitted by Garford Village Meeting with respect to the withdrawn planning application 11/01281/FUL (GAR/21615), is herewith reiterated in full (copy attached).

The recent and revised application, 11/02453/FUL, appears to be substantially similar to that previously withdrawn, albeit with the inclusion of further documents. Comments on these new and/or revised documents are as follows:

We note that the appendices to the "Addendum Transport Report" were only published on or around 14<sup>th</sup> November, and the "funeral director survey report" was released on 25<sup>th</sup> November following our FOI application.

**1. Covering letter submitted by Genesis Town Planning**

Para 1. Genesis refer to a meeting with yourselves on 22<sup>nd</sup> August and a subsequent letter to you dated 9<sup>th</sup> September "...addressing your further queries..." This letter does not seem to be included in the associated documents list. May we have sight of this letter, please?

Para 5. Reference is made to peak-time delays, of as much as 20 minutes, being identified by the "further transport analysis". Closer examination of the data, however, which appears as Appendix 2 to the Addendum Transport Report, in the form of a letter from Bellamy Roberts to Mr J Hodgson, reveals that the 20 minute peak-time delay quoted actually occurs on the A40 approaching the Green Road roundabout Westbound (i.e. from Wheatley/M40 direction). This is not a route upon which any of the Funeral Directors referred to in the application or any of the proposed "catchment population" will be travelling. This data is, therefore, in no way relevant to the proposal.

Peak time delays for traffic approaching Eastbound (i.e. from the Northern sector of the proposed "catchment area") are stated as 6.8 mins (am) and 8.9 mins (pm). This does not seem either excessive or unrepresentative of peak-time delays associated with any major junction, and is probably quite good compared to most.

Peak time delays for traffic approaching Northbound (i.e. from the Southern sector of the proposed "catchment area") are stated as 4.5 mins (am) and 15 mins (pm). A 4.5 minute delay on a major junction in morning peak traffic is insignificant.

Delays of this magnitude, and greater, are also common at peak times on the A415 between Witney and Marcham as well as through the towns of both Abingdon and Didcot, and other key routes comprising a considerable proportion of the proposed "catchment" population. There is no evidence of analysis of delays on these or any other routes to the proposed new site, without which there is no reason to believe the situation would be any better. Local knowledge would suggest that the actual situation is most likely to be worse.

The only delay, therefore, at this junction, of any potential concern to mourners is that occurring at the 17.00 peak travel time, Northbound, on the A4142. However, since this is by no means a preferred time for funerals, as discussed below, it is hardly relevant.

The data in appendix 2 also confirms that traffic approaching the Green Road roundabout is exceptionally free-flowing at non-peak times. The following average speeds can be calculated from this data set:

A40 Westbound 40mph (50 mph speed limit)  
A40 Eastbound 50mph (70 mph speed limit)  
A4142 Northbound 47mph (50mph speed limit)

The accompanying comment that "Such lengths of delay are unacceptable..." is not supported by the data actually presented in the same letter. The applicant appears to have simply "cherry-picked" the only piece of data that supports the argument, despite the fact that it is the one piece of data which is not, in fact, relevant.

The comments following the data set (page 2 of the letter referred to above) are pure conjecture and, again, not supported by the data presented therein.

Note: The text of the above letter also states that the differences in time to travel the same stretch of the A40 eastbound vary by as much as 20 minutes. This statement is clearly contrary to the data presented.

Given the above, it is clear that any argument suggesting that traffic delays on the North and East bound approaches to the Green Road roundabout are out-of-the-ordinary or unacceptable is not sustainable under any reasonable challenge.

Paragraph 5 continues "...inevitably these delays will have a ripple effect upon the surrounding and interconnecting road network. It is therefore very likely that the overall delays experienced...will be significantly greater..." These statements appear to be unsubstantiated, unscientific conjecture made in an attempt to augment the previous, erroneous, point, since they are not supported by any evidence.

Para 6. The statement is made that preferred funeral times of between 11.00 and 15.00hrs are most popular "...specifically because of the travel delays that are experienced at other times of the day..." This spurious comment is not only most unlikely, it is not supported by any evidence. As would be obvious to anyone who has ever arranged a funeral, these times are actually preferred by mourners because both lunchtime and teatime wakes can follow on naturally. Following a 9.00am service, 10.00am is as inconvenient a time to begin a wake as is 6.00pm following, say, a 5.00pm service.

The remainder of this paragraph, which builds on this spurious conjecture, must be viewed with similar circumspection.

Para 7. From discussion with the operators of Oxford Crematorium, it was revealed that, even during peak demand hours (2.15pm), maximum utilisation is only 71% of capacity, i.e. Oxford Crematorium is never at maximum capacity, can always offer services within a reasonable bandwidth either side of specific timeslots requested, and consequently is never the cause of delays to services. It was further revealed that delays in timing of funeral services were mostly caused by other factors, including the capacity of some funeral directors and their reluctance to hire additional hearses to meet demand.

The statement that this "...proposal will save over 21,300km per car/annum...[equating] to 320,000km of travel saved per annum..." is fundamentally flawed in every respect. The calculation is based on the following:

- i) It is simplistically and incorrectly assumed that all mourners will be travelling from the location of the funeral director (see letter Garford Village Meeting 29/07/2011; Att C; para 3.4.2).
- ii) It is assumed that ALL cremations from the proposed "catchment area" will be performed at the proposed new site, equating to 1411 services per annum, well in excess of even the optimistic speculation of 1100 cremations per annum, as quoted in the Planning Statement. This data, essential in calculating the figure 21,300km, has been concealed or deleted from the chart provided in Appendix 1 of the Addendum Transport Report for reasons that can only be speculated upon. However, this chart is replicated in Attachment 1, herewith, with ALL data reinstated.

Even if the false assumption that ALL mourners travelled from the location of the funeral director was hypothetically accepted, the "distance saved" figure, when proportioned, pro-rata, to even the optimistic estimate of 1100 cremations per annum, equates to only 16,617km (9970 miles). When a more realistic estimate of

750 cremations is applied (see note below), this equates to only 11,330km (6798miles).

Note: Thatcham Crematorium, which is located adjacent to the Newbury/Thatcham conurbation (population 60,000) and which has a total catchment population significantly greater than that of this proposal, undertook only 873 cremations in 2010, four years after opening.

However, as outlined in our previous letter, and as anybody who has attended a funeral knows, the fact is that, for any given funeral service, the majority of mourners travel from locations randomly dispersed around the UK. Since 88% of the population of the UK live North and East of Oxford, the majority of mourners would pass close to Oxford Crematorium (via M40/A34 or M40/A40) on their way to the proposed new site, 25km further South, adding 50km to each journey.

The effect of this is a substantial INCREASE in overall distance travelled, per annum, of 220,423km.

Full calculations are shown in Attachment 2, including all assumptions used.

Whilst we accept that this calculation could be further refined, it clearly illustrates that the assumptions used by the applicant are grossly simplistic, do not take into consideration the wider issue, can be readily challenged, and that the argument that this proposal implies a net reduction in distance travelled is unsustainable.

Para 8. This paragraph discusses the acceptability of sustainable development to both local and national planning policy.

The applicant argues the sustainability of this proposal with two main themes; i) reduction in distance travelled (discussed above), and ii) the proposal that waste thermal energy from the cremation process will be used to heat the chapel. The latter claim that this would make "... the building extremely energy efficient ..." is substantially misleading as it would, in fact, only account for less than 1% of recoverable energy available. The remaining 99% (around 280kWh of recoverable energy PER CREMATION) will simply be discharged to atmosphere, equating to more than 1.5 MegaWatt hours of recoverable energy being wasted, PER DAY (providing a carbon footprint of over 60 tonnes CO2 per annum). An increasing number of crematoria operators, both UK and worldwide, are recovering over 95% of this waste heat with alternative energy schemes. To preclude this at a stroke, through inappropriate siting, as even a possibility for the future would seem to be a negligent waste of a considerable potential opportunity for carbon emissions reduction.

It is difficult, in fact, to identify any credible grounds for claims of sustainability with this proposal, whatsoever.

## **2. Addendum Transport Report**

Para 8. This paragraph refers to the claims of a reduction in distance that would be travelled by mourners. Please see comments above (ref. Covering Letter para 7, above).

Para 9. As discussed both previously and above, it would seem more appropriate to replace the adjective "simple" with "simplistic". This paragraph appears to indicate, as suspected, that no customer behaviour factors or other rigour was applied to the (flawed) logic behind this calculation.

Para 10. This paragraph discusses the reluctance of mourners to use Oxford Crematorium during peak travel periods. Please see comments above (ref. Covering Letter para 6, above).

Para 11. There is no credible evidence provided to support claims that funeral directors are reluctant to use or recommend the use of Oxford Crematorium. This statement implies that this is the case, both in general and particularly during peak travel periods. Personal experience, both past and as recent as this year, undermines this claim, as does evidence from the alternative crematoria operators (see below). The claim is certainly not supported by the Oxford Crematorium utilisation figures.

Para 12. This paragraph states that travel times [around Oxford Crematorium] are unreliable during peak travel periods. This could be said of most major routes, including those around Marcham, Garford, Abingdon and Wantage (ref. Covering Letter para 5, above).

Para 13. It is stated that funeral directors choose to travel further afield to avoid Oxford Crematorium. There is no evidence provided to support this claim. Again, personal experience, both past and as recent as this year, undermines this claim, as do the Oxford Crematorium utilisation figures.

Furthermore, a discussion with the Manager of Swindon (Kingsdown) Crematorium on 10<sup>th</sup> November revealed that only one service booked in the forthcoming four week period was from outside their local area. No routine transference from Oxford Crematorium catchment, or, indeed, from anywhere outside their own catchment, was recognised by Kingsdown.

Para 14. Regarding travel times during peak hours, this could be said of most major routes, including those around Marcham and Garford (ref. Covering Letter para 5, above).

Para 15. This paragraph again refers to the claims of a reduction in distance travelled by mourners. Please see comments above (ref. Covering Letter para 7, above).

Para 16. This paragraph reiterates that mourners are discouraged from using Oxford Crematorium because of peak time traffic. There is no evidence to support this spurious claim (see 1. Para 6, above). Again, personal experience, both past and as recent as this year, and information provided by other Crematoria operators, undermines this claim, as do the Oxford Crematorium utilisation figures.

Para 17. It is stated that the Highways Authority raised no adverse comments with respect to the previous scheme. This would not appear to be the case. (See letter Garford Village Meeting 29/07/2011; Att C; paras 3.2 and 3.4.4.)

### **3. Funeral Director Survey**

Analysis of the, recently released, redacted "Funeral Director Survey" yields the following data:

3.1 Of the 19 funeral directors canvassed, 4 chose to abstain. (Note: The redacted document indicates that 18 funeral directors were canvassed. This appears to be an error in the row numbering).

3.2 The total number of funerals undertaken by the 15 funeral directors who agreed to take part is 2020. This figure, when added, pro rata, to those who chose to abstain, provides an estimated total of 2559 funerals from all funeral directors canvassed. It is clear, therefore, that either the numbers quoted are incorrect, or else canvassing took place outside the proposed "catchment area", since the total number of deaths per annum within the proposed "catchment area" is only 1411, as discussed above. Alternatively, perhaps the applicant actually expects significant levels of business from outside the proposed "catchment area", in which case the argument proposing reduced travel distances is even further compromised.

3.3 The specific complaints expressed in the survey, break down into the following categories, ranked in order of number of complaints:

	Issue	Complaints	Satisfied	Neutral
1	Pricing at Oxford Crematorium	9		
2	Quality of service at Kingsdown (Swindon)	9		
3	Saving of journey time for Funeral Director	8		
4	Peak time traffic at Oxford Crematorium	8		1
5	Location	7		
6	Quality of service at Oxford Crematorium	4	3	
7	Oxford Crematorium availability	4		
8	Would like to see some competition	3		
9	Overall quality of service currently available	2		

3.3.1 The highest number of complaints is with respect to the pricing structure at Oxford Crematorium. This is hardly a matter for planning.

3.3.2 The quality of service currently available at Kingsdown, including the specific issue of service times and flow, is the temporary effect of the improvement schedule

currently being carried out as a direct result of funeral director consultation, as discussed in 5.1 (below). No funeral director complaints have been received by Kingsdown. All funeral directors know that normal service times and flow will be restored on completion of the works. Kingsdown have numerous messages of thanks and compliments from members of the public using their facility.

3.3.3 Saving journey time for the funeral directors themselves implies a very narrow view has been taken in respect of the overall travel impact.

3.3.4 The assertion that peak travel times at Oxford Crematorium presents a problem is by no means universally or unanimously stated. Only half of those canvassed actually agreed to some extent, whilst one felt it was satisfactory. Also, as discussed above, (1. Para 5) this assertion is not supported by the material facts.

The nature of the question eliciting the response must also be considered. If asked if traffic near Oxford Crematorium is ever slow, the answer must be affirmative and this would certainly be the case in relation to Garford and Marcham too.

3.3.5 Only seven of the fifteen respondents stated that they felt the location was suitable, whilst two felt they would prefer it to be located elsewhere.

3.3.6 Comments regarding the quality of service at Oxford Crematorium are few and inconclusive, being both positive and negative.

3.3.7 The remainder of the comments are significantly few and a minority view.

3.3.9 It is also worth noting that four of the respondents stated that they predominantly use Kingsdown in preference to Oxford. If this is the case, they must be local to Kingsdown since Kingsdown do not recognise routine transference from other catchment areas, as discussed below (5.1). Certainly the lady respondent from Carterton is significantly more local to Kingsdown than either Oxford or Garford/East Hanney.

3.4 It would seem that there is no conclusive majority view on ANY issue. Of 19 funeral directors canvassed, with 15 agreeing to comment, the highest number of complaints on any specific issue is only 9. Even then, that issue is not a matter for planning.



3.5 An analysis of the "Death to Service Time" data yields the following:

i) Death to service times vary considerably from business to business. The clear implication of this is that it is affected as much by complexities of service organisation as by anything else. The data can be summarised as follows:

	<b>Usual Conditions</b>	<b>Busy Conditions</b>
<b>Least</b>	5 days	n/a
<b>Most</b>	10 days	14 days
<b>Average</b>	<b>7.7 days</b>	<b>10.9 days</b>

Note: Only half of the respondents stated that the situation was ever anything but that shown in the column headed "Usual Conditions".

An average Death to Service time of 7.7 days hardly seems unreasonable. Indeed, significantly less than this could appear somewhat unseemly. A certain amount of time is necessarily required for personal emotional needs, and then for all other arrangements to be made, which are, nowadays, considerable.

3.6 The survey presented must be viewed with considerable circumspection for the following reasons:

i) The document can in no way be viewed as a true and impartial survey. It is a document composed by the applicant as the result of a canvassing exercise carried out with the express and specific intention of generating support for this planning application. As such, the questioning behind the canvass was almost certain to have been engineered to elicit the required responses. The choice of information for inclusion, and both the wording and phraseology, is that of the applicant, not of the respondents.

ii) The views expressed do not seem to have taken into account the wishes of the customer/mourner. Experience would indicate that mourners would invariably prefer to hold a funeral service as close to the home or family of the deceased as possible and would almost never entertain the idea of going further afield at the behest of a funeral director, or under any other operational circumstances. The idea of a funeral director "refusing to use Oxford Crematorium" against the wishes of a customer is simply not credible.

3.6 For the reasons given, it is concluded that no significant weight can be attached to the "funeral director survey" as presented.

#### **4. Site suitability**

4.1 We would again point out that, as with the previous application, contrary to the figure quoted in the Planning Application Form, the area of the site in question is not 3.8ha. As stated previously, when measured independently, it is not even clear that it is fully 2ha, the minimum requirement for compliance with the 1902 Crematorium act.

4.2 It is clear that the Highway Officer felt that the location is not ideal, not being conducive to modes of transport other than private car. This was disagreed with by the author of the Transport Assessment. The Transport Assessment also disagrees with the Highway Authority's view that the existing bus service is restrictive and inadequate.

There is an "Addendum Note" to the "Executive Summary" attached as appendix 1 to the "Addendum Transport Report" stating "Since submitted (sic) this Executive Summary on the transport sustainability issues associated with the proposed crematorium, the Highway Authority have acknowledged the different nature of the development proposal and raise no highway or transport concerns."

We would point out that the applicant has not adequately described this "different nature". Only a proportion of the visitors to a crematorium comprise a funeral party. A significant proportion also comprise other visitors, e.g. to grave sites and memorial plots. This is why some crematoria and burial sites (as this proposal is intended to be) remain open to visitors long after the last service is performed. Many of these visitors will undoubtedly require reliable access by public transport and means other than private car.

In view of these clarifications to both "nature of use" and "transport sustainability by private car", as discussed above, we would respectfully request the Highway Authority to review all the information and, perhaps, reconsider their conclusions.

We would also reiterate the inconsistency in the statement that "...mourners usually rally round and car share with friends, or relatives. As such car occupancy levels are high." (Executive Summary para 5). In the original Transport Assessment, (para 4.10) it is stated that car occupancy (including hearses) is 2.14 for an average 15 vehicles per funeral. Given that the occupancy of the accompanying limousines is usually 4 or more people, the average occupancy of all other vehicles cannot, therefore, be more than 2, hardly constituting high occupancy.

4.3 It seems inappropriate that all gardens, areas provided for quiet contemplation, and the proposed natural burial site are immediately adjacent to the busy and noisy A338. Presumably, this layout is simply to enable compliance with the requirements of the 1902 crematorium act with such a small site, which states that crematoria should be sited at least 50m from any highway. Most crematoria are set in much larger grounds at the end of long driveways (Oxford C200m, Thatcham C300m, Swindon C400m) with plenty of quiet garden areas surrounding the buildings and well away from any main roads. With this application, the buildings are a mere

80m from the main road with all gardens being situated between this and the main A338.

4.4 The site selection process, as discussed in the planning statement, was commented on in our previous submission. In addition to previous comments, it has further been established that no approach was made by the applicant to the local branch of the Farmers Union for offers of potential sites by members for evaluation. This would seem to be an obvious first step in any rigorous site survey for such a development and reinforces the previously stated probability that the site was summarily selected simply because of the landowner's willingness to sell.

## **5. Discussions with existing Crematoria Operators**

### **5.1 Swindon (Kingsdown)**

A discussion with the Manager of Kingsdown Crematorium revealed the following:

- i) This facility, utilising FOUR cremators, is currently undergoing significant re-development and modernisation which will significantly improve and bring up to date the service provided, including:
  - a) Extension to, and modernisation of, the Chapel
  - b) New waiting room
  - c) New offices
  - d) Abatement plant
- ii) Kingsdown hold regular meetings with funeral directors and act on input provided.
- iii) No complaints have been received from funeral directors. Feedback on re-development plans are positive and they have numerous examples of letters and verbal compliments from the public using the facility.
- iv) The gardens, in which natural burials can be accommodated, are well away from main roads. Traffic can neither be seen nor heard.
- v) Their grounds are well maintained and kept open until, nominally, dusk each day (8.00pm in summer), for convenience of visitors (no mention of such sympathetic proposal is made in this planning application).
- vi) Kingsdown do not recognise claims of routine transference from either Oxford Crematorium or anywhere else. The overwhelming majority of their business is local. At the time of the discussion (10<sup>th</sup> November), only one booking in the forthcoming four week period was from outside their local area.

## **5.2 Oxford Crematorium**

Communication with the operators of Oxford Crematorium revealed the following:

- i) No issues regarding transport problems or traffic delays are recognised by Oxford Crematorium.
- ii) Oxford Crematorium has significantly more capacity than is currently utilised. Maximum utilisation at peak demand time (2.15pm) is 71%.
- iii) As a logical consequence of ii) (above), Oxford Crematorium are not the cause of delayed funeral services. Delays are caused by other factors, including statutory requirements, funeral director capacity and the unwillingness of some funeral directors to hire additional hearses to meet demand.

## **6. Need**

The applicant has clearly relied heavily upon the Treswithian Downs Planning Appeal Report for both inspiration and material. Much of the wording and substance of the application is remarkably similar, as discussed previously. Indeed, the applicant even refers to themselves as "the appellant" in some parts of their supporting documentation. However, the two applications differ fundamentally, as discussed in our letter of 29<sup>th</sup> July (Attachment C, Para 1.5), possibly the most significant difference being that, in the Cornish case, the need was undisputed. It was not a question of why, but where.

(In the Cornish case, a population in excess of 100,000, West of Camborne, had no access to any crematorium other than Penmount which, at a considerable distance away in Truro, was already running significantly over capacity. This was coupled with a Regional Spatial Strategy (RSS) based model indicating an anticipated 20-35% increase in population and unsustainable demands on the existing crematorium.)

The opening claims of the applicant's Planning Statement are:

"This application has arisen out of recognition by crematoria operators, local funeral directors, Clergy and the local authority that there is need to make provision for a crematorium in the locality".

And later in the same document:

"In addition, Vale of White Horse District Council has expressed a need for the provision of a crematorium at a corporate policy level..."

However, there is no evidence to support claims in respect of either other crematoria operators or the Clergy. Also, despite substantial research by Garford

Village Meeting, VOWHDC are unable to identify any agreement supporting the claims made in respect of a local authority corporate level policy and this, too, appears to be unfounded.

## **7. Conclusions**

Given the above, it is difficult to avoid the conclusion that the applicant has deliberately set out to present a case for need which is not representative of the actual situation.

In reaching a conclusion on this application, and in addition to their own deliberations, we respectfully request both VOWHDC Planning department and members of the Committee to consider the following:

- i) Throughout the application documentation, data has consistently been "cherry-picked", calculated under flawed assumptions, and concealed, resulting in the presentation of material misstatements and misleading conclusions.
- ii) It seems peculiar that, if the qualitative case for a new crematorium in the area is as strong as is purported by the applicant, this has not been reported previously, e.g. by public representation to local council or the local press, for example.
- iii) Flawed analysis conclusions have been presented regarding peak travel time traffic delays at the Green Road roundabout in support of, otherwise refutable, claims that the public are reluctant to use Oxford Crematorium. Without similar comparable analyses being made of all routes approaching the proposed new site, this data is meaningless.
- iv) It is inevitable that funeral directors, as with any other service consumer, will always prefer to have additional facilities to choose from. There would be no reason for them to resist, and every reason to support, such an opportunity.
- v) The applicant's requirement for this development would appear to be to meet a private commercial aspiration. However, whilst such an aspiration could generate its own demand (as could a fast-food restaurant in the same location), this does not demonstrate need in any respect and, as such, cannot justify contravention of both local and central government planning policies and the causing of considerable and irreversible harm to the lowland vale.
- vi) The applicant's calculations and representations in respect of sustainability of the proposed development, from both a transport and operational point of view, are flawed in almost every respect, do not stand up to scrutiny and would not withstand any reasonable challenge.
- vii) Not one single piece of independent and impartial evidence has been presented in support of this application, such as a press article, an unsolicited complaint or a local government document.

viii) Despite working entirely to their own timescales, the applicant has manifestly failed to provide any compelling and incontrovertible evidence or calculations to support their claims of either quantitative or qualitative need. In doing so, the applicant has clearly defined the situation themselves. There is no need.

For the reasons given above, Garford Village Meeting concludes that this proposal does not stand up to detailed scrutiny and would respectfully urge Vale of White Horse District Council to refuse the application.

Yours sincerely,

A D

4 enclosures

ATTACHMENT 1

Replicated chart showing number of services required to calculate driving distances saved from location of funeral director to proposed new site

Node	Nearest Existing Facility	Distance to Existing (km)	Distance to Proposed (km)	Distance Saved (km)	Node population size	Population within catchment	Death Rate	No of Deaths / Services	Distance saved per year (= distance saved x no of services) (km)
VWH01	Oxford	15.45	11.35	4.10	6401	3092	0.008	25	202.84
VWH03	Oxford	14.25	10.45	3.80	10817	All	0.008	87	657.67
VWH04	Oxford	14.60	11.00	3.60	9299	All	0.008	74	535.62
VWH05	Oxford	16.10	9.55	6.55	5901	All	0.008	47	618.42
VWH06	Oxford	15.85	8.10	7.75	8885	All	0.008	71	1101.74
VWH07	Swindon	24.00	10.45	13.55	6694	All	0.008	54	1451.26
VWH08	Oxford	19.40	7.25	12.15	7203	All	0.008	58	1400.26
VWH09	Swindon	19.45	15.65	3.80	7926	2136	0.008	17	129.87
VWH10	Oxford	22.00	9.75	12.25	7481	All	0.008	60	1466.28
VWH11	Swindon	31.00	6.00	25.00	7419	All	0.008	59	2967.60
VWH13	Swindon	16.65	16.20	0.45	5639	2804	0.008	22	20.19
VWH14	Swindon	28.85	8.30	20.55	8993	All	0.008	72	2956.90
VWH15	Thatcham	28.00	19.40	8.60	8792	All	0.008	70	1209.78
WO-07	Oxford	26.00	22.05	3.95	5928	4904	0.009	44	348.67
WO-08	Oxford	22.00	22.00	0.00	8651	All	0.009	78	0.00
WO-09	Oxford	25.20	21.25	3.95	5695	All	0.009	51	404.91
WO-10	Oxford	22.65	20.45	2.20	8418	All	0.009	76	333.35
WO-11	Oxford	18.50	18.50	0.00	5436	2544	0.009	23	0.00
WO-12	Oxford	30.30	26.30	4.00	6305	2218	0.009	20	159.70
WO-15	Swindon	26.10	17.20	8.90	6344	5221	0.009	47	836.40
SO-06	Oxford	17.40	15.25	2.15	8152	4163	0.008	33	143.21
SO-07	Oxford	17.00	17.00	0.00	7175	1914	0.008	15	0.00
SO-09	Oxford	24.60	15.70	8.90	7099	All	0.008	57	1010.90
SO-10	Oxford	27.60	13.85	13.75	5472	All	0.008	44	1203.84
SO-12	Reading	23.75	23.75	0.00	8019	All	0.008	64	0.00
SO-13	Oxford	25.95	16.05	9.90	5290	All	0.008	42	837.94
SO-14	Oxford	27.45	15.85	11.60	5593	All	0.008	45	1038.06
SO-15	Reading	24.10	22.85	1.25	7776	2708	0.008	22	54.16
WB-01	Thatcham	22.65	19.90	2.75	5969	1836	0.007	13	70.69
WB-02	Thatcham	31.30	27.65	3.65	5446	3036	0.007	21	155.14
<b>TOTAL NUMBER OF SERVICES</b>					<b>1411</b>			<b>1411</b>	

Annual distance saved assuming 1411 services (km)	21315
Annual distance saved assuming 1100 services (km)	16617
Annual distance saved assuming 750 services (km)	11330



## **ATTACHMENT 2**

### **Calculation of difference in car journey distance comparing proposed site to Oxford Crematorium**

#### **Data used for calculations**

#### **1. Distance saved in journey from location of Funeral Director to proposed new site, per annum:**

Assuming 1411 services: 21,315km

Assuming 1100 services: 16,617km

Assuming 750 services: 11,330km

#### **2. Number of cars travelling from location of funeral director, per service: 5**

#### **3. Number of cars travelling from random locations across UK, per service:**

10 – split 88% from N & E of UK; 12% from S & W of UK.

#### **4. Approximate reduced/additional distance for traffic from North and East of Oxford (M40/A34/A40):**

Compared to Oxford Crematorium: + 50km

Compared to Swindon Crematorium: - 40km

Compared to Reading Crematorium: 0km

Compared to Thatcham Crematorium: 0km

(For Reading and Thatcham, additional distance for traffic from the North is negated by reduction in distance for traffic from the East).

#### **5. Approximate reduced/additional distance for traffic from South and West of Oxford (M4/A34):**

Compared to Oxford Crematorium: - 40km

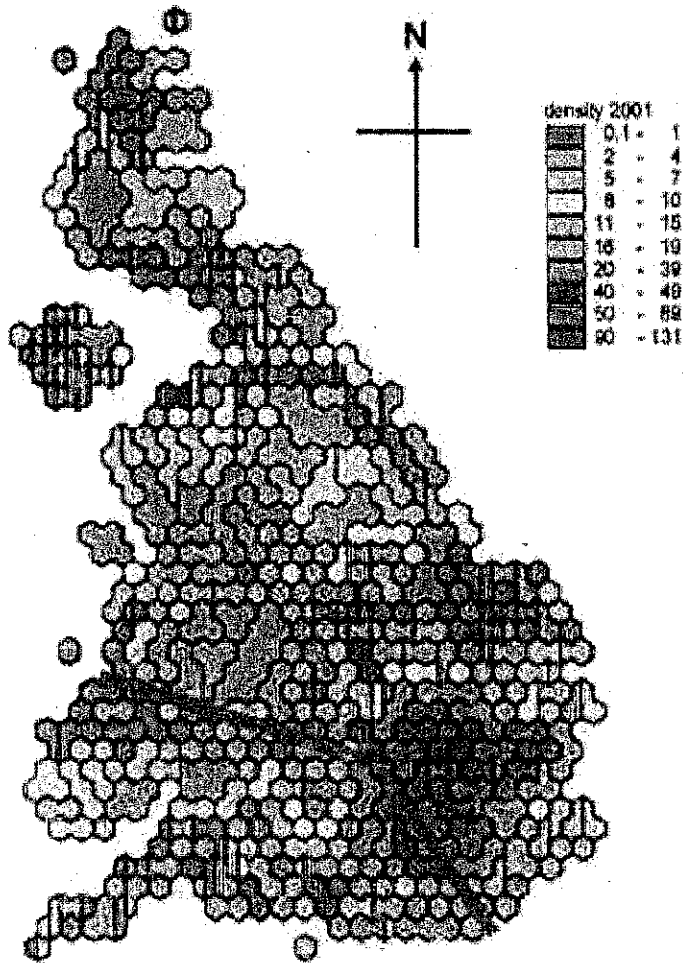
Compared to Swindon Crematorium: + 40km

Compared to Reading Crematorium: 0km

Compared to Thatcham Crematorium: 0km

## UK Population Density Map

Indicating proportion of UK road traffic approaching Oxfordshire from Northern & Eastern routes (approx 88%) vs those approaching from Southern & Western routes (approx 12%)



Source: 2001 Census, Office for National Statistics, UK Population Density, 2001

**————— Traffic dividing line (approximate)**

Traffic from North and East of line (approx 88% UK population) would approach Oxfordshire via M40/M42/Northern A34 - resulting in increased distance to the proposed new crematorium, compared to Oxford Crematorium.

Traffic from South and West of line (approx 12% population) would approach Oxfordshire via M4/A420/Southern A34 - resulting in reduced distance to the proposed new crematorium, compared to Oxford Crematorium.

**CALCULATION OF CHANGES TO TRAVEL DISTANCES CONSIDERING PROPOSED CREMATORIUM WITH RESPECT TO EXISTING**

**KEY**

**SAVED OR REDUCED JOURNEY DISTANCES SHOWN IN BLUE (-ve sign used for calculation purposes)  
INCREASED JOURNEY DISTANCES SHOWN IN RED**

Node	Nearest Existing Facility	No of Deaths / Services	Distance saved per car per year (ie distance saved x no of services) (km)	Distance saved per year - 5 cars from location of funeral director	Distance saved/divided for journeys from North and East of UK (km)	Distance saved/divided for average 6.8 cars from North and East of UK (km)	Distance saved/divided for journeys from South and West of UK (km)	Distance saved/divided for average 1.2 cars from South and West of UK (km)	
VWV-01	Oxford	25	-203	-1014	50	15284	-40	-1187	
VWV-03	Oxford	87	-488	-3288	50	15074	-40	-4184	
VWV-04	Oxford	74	-435	-2878	50	15112	-40	-2971	
VWV-05	Oxford	47	-816	-3092	50	20774	-40	-2266	
VWV-06	Oxford	71	-1102	-5509	50	21076	-40	-3472	
VWV-07	Swindon	54	-1451	-7186	50	22563	-40	-2370	
VWV-08	Swindon	58	-1400	-7001	50	22335	-40	-2736	
VWV-09	Swindon	17	-180	-845	40	-8016	40	870	
VWV-10	Oxford	80	-446	-3351	50	22133	-40	-2873	
VWV-11	Swindon	59	-285	-1433	40	-20892	40	249	
VWV-13	Swindon	72	-20	-101	40	-7898	40	671	
VWV-14	Swindon	72	-2957	-14784	40	-29324	40	3457	
VWV-15	Thatcham	70	-1210	-849	0	0	0	0	
VWV-07	Oxford	44	-345	-1743	50	15420	-40	-2119	
VWV-09	Oxford	78	0	0	50	14354	-40	-2737	
VWV-05	Oxford	51	-405	-2025	50	22587	-40	-2480	
VWV-10	Oxford	78	-333	-1667	50	23132	-40	-2637	
VWV-11	Oxford	23	0	0	50	16074	-40	-1069	
VWV-12	Oxford	20	-180	-758	50	17674	-40	-989	
VWV-15	Swindon	47	-835	-4182	40	-16540	40	775	
VWV-05	Oxford	33	-143	-745	50	14834	-40	-1598	
VWV-07	Oxford	15	0	0	50	5717	-40	-735	
VWV-09	Oxford	57	-1011	-5054	50	24566	-40	-2726	
VWV-10	Oxford	44	-1204	-6019	50	19261	-40	-2104	
VWV-12	Reading	24	0	0	0	0	0	0	
VWV-13	Oxford	42	-838	-4190	50	18521	-40	-2031	
VWV-14	Oxford	46	-1036	-5190	50	18867	-40	-2148	
VWV-15	Reading	22	-54	-271	0	0	0	0	
VWV-01	Thatcham	13	-74	-343	0	0	0	0	
VWV-02	Thatcham	21	-185	-776	0	0	0	0	
		<b>1411</b>	<b>-21315</b>	<b>-106577</b>		<b>364694</b>		<b>-37694</b>	
								<b>TOTAL DISTANCE ADDED (km)</b>	<b>220473</b>

APP 3



**Vale of White Horse**  
District Council

**PARISH/TOWN COUNCIL RESPONSE FORM**

The observations of East Hanney Parish/Town Council

Register No: 11/02453/FUL

Officer: MR Martin Deans

Application Number: 11/02453/FUL

Address of Proposal: Garford Crematorium Site, Garford, Abingdon, Oxfordshire,

Please select the response that most accurately reflects your views on this application by ticking one box and providing the relevant reasons where this is requested, using a separate sheet if required.


1. Fully Support for the following reasons:

2. No objections.

3. Do not object but request the following issues be given consideration:

4. Object for the following reasons

PLEASE SEE ATTACHED LETTER

Signed by: ..... 

Dated: 09.11.2011 .....

11 Minns Road  
Grove  
Wantage  
OX12 7NA

8 November 2011.

Head of Planning  
Vale of White Horse District Council  
Abbey House  
Abingdon  
OX14 3JE

Dear Sir

**Garford Crematorium site: Planning Application 11/02453/FUL**

This application has been considered by councillors by correspondence.

The following comments represent the views of councillors.

The majority of councillors ( four out of six ) have expressed objections ( in one instance strong objections ) to the application.

The main basis for the objections is that envisaged location is inappropriate and that not only would any such development inevitably generate additional traffic on what is already a busy road ( and one which with additional development in the Wantage/Grove area is likely to become even busier ) but would involve an additional road junction ( with a significant proportion of the traffic to the site needing to turn right into the site.)

With this site being in the ' middle of nowhere ' it is almost inevitable that almost all people visiting this location would come by car and there is real doubt as to whether the current plans provide adequate parking spaces ( because of the location there could be no offsite parking ).

On the above basis the majority view of councillors from East Hanney Parish Council is that planning permission should not be granted.

Yours faithfully



John Hedderley  
Clerk to East Hanney Parish Council

**MARCHAM PARISH COUNCIL**

Clerk: Mrs. L.A. Martin B.A.,  
Tel: Frilford Heath  
(01865) 391833  
Email: Clerk@marchamparishcouncil.gov.uk

90 Howard Cornish Road,  
Marcham, Abingdon,  
Oxon. OX13 6PU

Mr. M. Deans,  
Development Control,  
Vale of White Horse District Council,  
Abbey House,  
Abingdon,  
Oxon.  
OX14 3JE

14th November, 2011

Dear Mr. Deans,

**11/02453/FUL – Erection of new crematorium, with associated highway works, car park, gardens of remembrance, and provision of land for natural burials  
Land east of the A338 Garford  
For: Memoria Ltd**

The Parish Council objects to the proposal, as it is of the opinion that the proposed positioning of the building is in a very sensitive location resulting in visual harm for the area. The location of the development is within the lowland Vale which is an essential part of the landscape quality of the district and is protected by local plan policies.

The Council believes that it fails to comply with policy GS2 in that it is not on land identified for development in the Local Plan. The proposal represents development in the open countryside without any proven need for the facility. There seems to be no justifiable reason for siting the development at the given location other than a commercial one, and the statistics given, show a decline in the number of cremations in Oxfordshire, so even commercial need cannot be proven. The issue of landscape harm overrides any suggestion of need.

The proposed development by virtue of its size and location would have a harmful impact on the character of the local landscape and therefore would be contrary to policies NE9 and NE10 of the Local Plan.

Existing public rights of way are in the vicinity where the public enjoy access, having an informal recreational area. The proposal is to be sited close to the path network. There are genuine concerns regarding the impact on the amenity of the area as the buildings would clearly be seen from the public footpaths and bridleways.

Of particular great concern to Marcham parish, is the implication for traffic. The proposal provides for the potential for hundreds more vehicles per day passing through the village. The A415 through Marcham, with its blind bends, is unsuitable for a considerable increase in the

number of vehicles. The road directly abuts houses in certain locations and there is no footway for pedestrians. When traffic incidents occur on the A34 vehicles run through Marcham. The road through the village is therefore unsuitable for slow moving courteses. The Council is concerned too about the entrance off the A338 into the site, particularly for vehicles arriving from the South given the accident statistics and fatalities that have occurred at Venn Mill. The right turn for vehicles from the South would be immediately after a blind bend. The potential for even more accidents is enormous.

In conclusion, the Council would argue that the application fails to comply with Local Plan policies, the traffic impact on rural roads would be unacceptable and there appears to be no benefits which would outweigh the harmful impact of the proposal on the local environment and landscape. The siting of the development at the specified location cannot be justified and the Parish Council would urge refusal of the application.

Yours sincerely

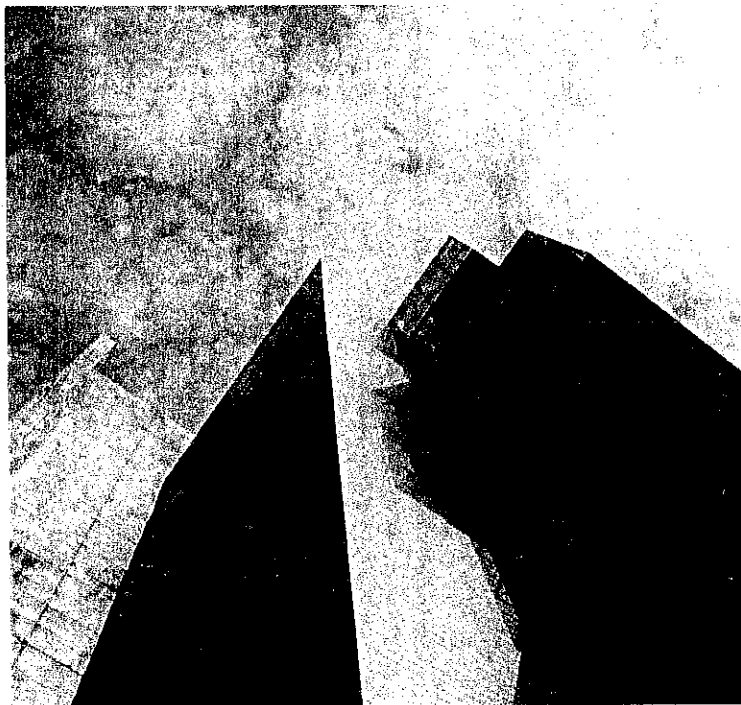


Clerk Marcham Parish Council



## Vale of White Horse District Council

# Analysis of Memoria Crematoria's Application for a Crematorium on Land at Garford



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Job No: 26591-002

# 1 INTRODUCTION

- 1.1 Vale of White Horse District Council has instructed Roger Tym & Partners to appraise the recent full planning application (ref. 11/02453/FUL) by Memoria Crematoria Ltd for a crematorium on land adjacent to the A338 at Garford, approximately two kilometres north of the village of East Hanney. The application was submitted in October 2011 and replaces an earlier application (ref. 11/01281/FUL) which was withdrawn by the same applicant.
- 1.2 In this report, we provide our observations regarding the application, focusing on the needs assessment prepared by Leisure Markets (LM) on behalf of the applicant, and also the requirements set out in the development plan and other policy documents. Our instruction does not extend to consideration of design, amenity, ecology, highways and various other matters, which we assume are being dealt with by appropriate specialists.

## Structure of Our Report

- 1.3 Our report is structured as follows:
- in Section 2, we describe the policy context against which the proposed development must be assessed;
  - in Section 3, we provide the findings from our review of the needs assessment submitted by the applicant; and
  - in Section 4, we summarise the findings from our audit and provide our recommendations to the Council.



## 2 THE PROPOSED DEVELOPMENT AND THE PLANNING POLICY CONTEXT

### The Proposed Development

- 2.1 The application seeks permission for the development of a crematorium with 296 sq.m of internal floorspace together with gardens, land for natural burials, car parking and associate highway works. The application site covers an area of approximately 2.15 ha and is located adjacent to the A338, in open countryside between the villages of East Hanney and Frilford. The site is currently open arable land, bounded to the south by Nor Brook and to the north east by the A338.
- 2.2 The site does not lie within the defined development boundary of any the District's settlements, and is located in land designated in the Local Plan as 'Lowland Vale' and covered by Local Plan Policy NE9. The implications of this and of other local and national policies are discussed in more detail below.

### The Cremation Act of 1902 and Subsequent Guidance

- 2.3 New crematoria must take into account the requirements of the Cremation Act of 1902. This Act has been amended on several occasions since 1902, but remains in force. In addition to numerous requirements on the operation of the cremator, the Act places several restrictions on the layout and siting of the crematorium. In particular, it is required that:
- 'No crematorium shall be constructed nearer to any dwelling-house than two hundred yards, except with the consent, in writing of the owner, lessee and occupier of such house, nor within fifty yards of any public highway, nor in the consecrated part of the burial ground of any burial authority.'*
- 2.4 The requirements of the 1902 Act, outlined above, clearly make it difficult to develop new crematoria in urban locations, and as the Inspector noted when considering a similar case in Cornwall in 2009:
- 'It has generally been accepted that due to the constraints imposed by other legislation, particularly The Cremation Act 1902, most new crematoria will require a rural or countryside location.'*<sup>1</sup>
- 2.5 It is also necessary to take into account the former Department for the Environment's 1978 guidance on the siting and planning of crematoria, which required the site to be suitable for the purpose, accessible by public transport, able to provide easy vehicle movement to and from the building and sufficient car parking, and for the crematorium to not have any material effect on the immediate neighbourhood.
- 2.6 In our assessment the application site at Garford meets the requirements of the legislation and guidance summarised above. It is situated in open countryside, around 1km from the

<sup>1</sup> Appeal-Ref App/D0840/A/09/2098108, Land at Race Farm, Puggis Hill, Treswitham, Camborne, Cornwall, TR14 0PU: Appeal by Crematoria Management Ltd against the decision of Kerrier District Council, now replaced by Cornwall Council

nearest dwellings (which are in the small village of Garford to the north east), and the proposed layout places the crematorium itself around 100m from the main road. There is good vehicular access to the site, and the provision of 55 car parking spaces should be sufficient for a facility of this size. Three buses per hour run along the A338 between Oxford and Wantage, but the nearest bus stop is around 800m to the north of the site. The site is therefore not particularly convenient for public transport, although it could potentially be made more accessible through the provision of a new bus stop adjacent to the site. However, this lack of accessibility is likely to be an issue with most potential sites which adhere to the requirements of the 1902 Act.

## Planning Policy Context

### *National Policy*

- 2.7 Planning Policy Statement 7 – *Sustainable Development in Rural Areas* (PPS7) seeks to strictly control development with the aim of protecting the intrinsic character and beauty of the countryside. The key policy aims of PPS7 are to focus development in or adjacent to existing towns and villages and to discourage the development of greenfield land, especially where that land is not adjacent to existing settlements. The document states that '*new building in the countryside away from existing settlements ... should be strictly controlled, with priority being given to the re-use of previously developed sites.*'
- 2.8 It should be recognised that crematoria are a unique and specialised form of development, and that it is very difficult for any new crematorium development to satisfy the needs of PPS7 while also satisfying the needs of the Cremation Act of 1902. However, it may be possible when looking for sites for crematoria to identify sites which at least go some way towards meeting the policy aims of PPS7 – for example, by making use of sites which are outside of but adjacent to or close to existing settlements. It is difficult to argue that this site fulfils the policy aims of PPS7.

### *The Development Plan*

- 2.9 The development plan for Vale of White Horse currently comprises the South East Plan in combination with the Vale of White Horse Local Plan 2011, which was adopted in 2006<sup>2</sup> (the development plan also includes the Oxfordshire Structure Plan (2003), from which three saved policies remain in place, but none of these are relevant to this application.)
- 2.10 There is no specific policy in the development plan regarding crematoria, and it seems counter-intuitive to treat such developments as 'employment sites' or 'utilities' as neither category adequately describes the primary purpose of the development. Crematoria are 'Sui Generis' and merit consideration on their own terms, taking into account the requirements of the Cremation Act of 1902. It is arguable that crematoria could be considered 'community facilities', and there are several policies relating to community facilities in the development plan which merit consideration if this definition is accepted. However, we would advise caution in taking this approach; there is no specific definition of

<sup>2</sup> In July 2009 the Secretary of State directed that most policies detailed in the Local Plan should be saved.

'community facilities' in the development plan, but community facilities are more commonly taken to include developments in Use Class D1 or D2. Consequently, we would not necessarily expect policies relating to community facilities to explicitly refer to the development of new crematoria.

*The South East Plan (2009)*

- 2.11 The South East Plan was adopted in 2009, and remains part of the development plan, despite the Government's intention to abolish the regional tier of planning. The Plan contains no specific mention of crematorium provision, but Policy S6 discusses the provision of community infrastructure. Policy S6 states that *'local planning authorities, in consultation with those delivering services using community infrastructure (including the Third Sector and Faith organisations), will ensure facilities are located and designed appropriately, taking account of local needs and a whole life costing approach.'* The policy also states that such facilities should be accessible to all sections of the community, in both urban and rural locations. However, the examples of community facilities discussed in the text (*'childcare, community centres, village halls, places of worship, fire and rescue stations, leisure centres, libraries, police stations, prison provision, social services facilities, and waste and recycling facilities'*) all operate on a much more local scale and cater to a much more geographically focused population base than the proposed crematorium development is expected to. We would not therefore interpret this policy as necessarily supportive of the proposed development.

*Vale of White Horse Local Plan 2011 (2006)*

- 2.12 The objectives of PPS7 are reflected in the saved Local Plan policies. The key policies relevant to this application are set out below.
- 2.13 Policies GS1 and GS2 set out the general location strategy for development in the District. Policy GS1 states that development is to be concentrated at the five main settlements of the District (Abingdon, Botley, Faringdon, Grove and Wantage), and in the area to the west of Didcot as part of a comprehensive western expansion of the town. Small scale development will be allowed within the built-up areas of villages, provided that important areas of open land and their rural character are protected. The proposed development clearly does not conform to this policy; it is around five kilometres from the nearest of the specified main towns (Grove), and just over one kilometre from the nearest village (Garford). It is also within an important area of open land (as discussed below in relation to Policy NE9). Most of the application site will remain undeveloped, and it is arguable that the impact will be minimal (see landscape and visual assessment), but there will nonetheless be some visual impact from the development.
- 2.14 Policy GS2 confirms this position, stating that outside of the built up areas of existing settlements, with certain specific exceptions, *'new building will not be permitted unless it is on land which has been identified for development in the Local Plan'*. In the Planning Statement which accompanies the application, the applicant refers to the explanatory text in paragraph 3.8 in relation to Policy GS2, which states that *'in some very limited circumstances, new building will be allowed outside the built up area of settlements to meet the needs of local communities'*. However, paragraph 3.8 also gives the examples of

social housing and recreational facilities on the edge of a village as possible examples of such 'very limited circumstances'. These examples refer to the development needs of a particular village, and are of a much more 'local' scale than the needs a crematorium would meet. Indeed, the applicant's needs assessment refers to a catchment area similar in scale to the whole District. Consequently, this application would not appear to be an example of the limited circumstances where an exception to Policy GS2 might be allowed.

- 2.15 Policy NE9 relates to the Lowland Vale designation, within which the application site is located. The policy states that *'development in the Lowland Vale will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area'*. The proposed development would clearly have an impact on views; however, the proposed layout and landscaping of the scheme should minimise this, and the landscape and visual assessment which accompanies the application concludes that *'the buildings and landscape proposals would have very limited visual impacts on the local area ... there would be no loss of significant landscape features, and appropriate planting would be in keeping with the landscape structure of the site.'*
- 2.16 Policy CF2 specifies the circumstances under which development *'in connection with the provision of new services and facilities for the social well-being of communities'* is permissible. Examples of such facilities include *'medical centres, schools, veterinary practices and places of worship'*; it is reasonable to assume that crematoria fall under this definition. Indeed, in his report following examination of the Local Plan, the Inspector stated in relation to the need to allocate land for a crematorium that *'I am satisfied that the application of the criteria in policy CF2, and other relevant plan policies, would enable an appropriate site search to be undertaken in accordance with the principles of sustainability.'*
- 2.17 Policy CF2 goes on to state that such development will only be permissible where the proposal conforms with the general policies for development (as described above) and is *'within the built-up area of a settlement or within and adjacent to a group of existing buildings providing for such uses.'* In exceptional circumstances, development outside the built-up area will be permitted, but the policy specifies that such exceptions must be *'adjacent to the built-up area of a settlement'*. The application site is clearly some distance from existing settlements, and the application therefore does not conform to this policy.

#### *Assessment of Alternative Sites*

- 2.18 In its Planning Statement, the applicant carries out an assessment of a number of alternative sites in Vale of White Horse. Of the sites considered, the one which appears most favourable in planning terms is Site 3 (Land off Marcham Road) which is on the edge of Abingdon. However, the applicant states that the landowner is unwilling to consider selling the site.
- 2.19 More broadly, the applicant makes the point that due to the expected demand for residential growth across the District, and to the planning policies discussed above, there is a high value attached to land adjacent to existing settlements, and it is therefore difficult for developers of crematoria and other low-density uses to afford these sites. This is almost certainly the case, but does not seem a convincing reason to override the development plan.

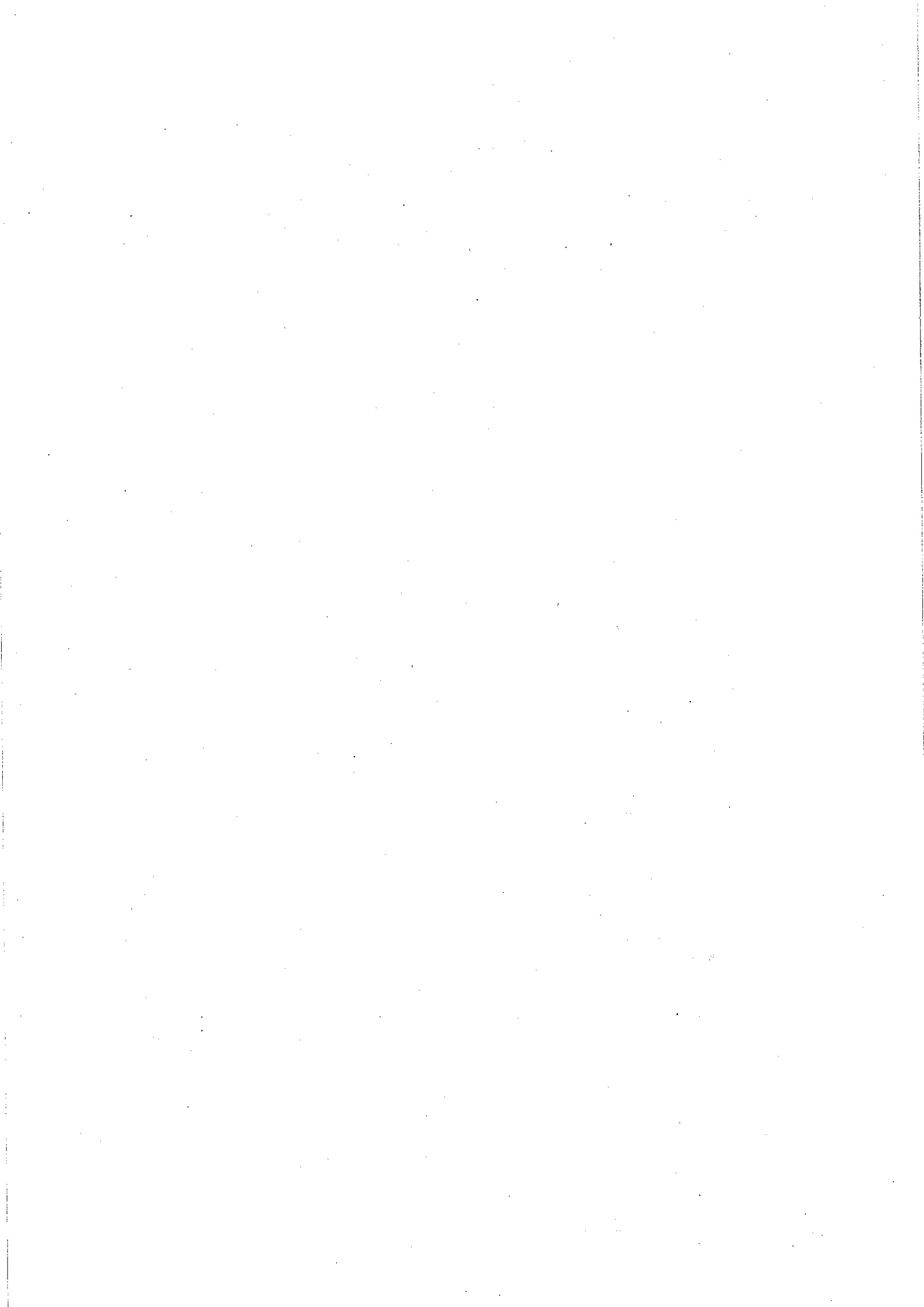


### *Traffic*

- 2.20 The Transport Assessment (TA) which accompanies the application concludes that the increase in traffic on the A338 as a result of the proposed development would be no greater than 1.9 per cent, and that all increased traffic could be accommodated on the existing highway. However, a thorough assessment of this TA is beyond the scope of our instruction

### *Policy Context: Conclusions*

- 2.21 The proposed development lies in open countryside, around one mile from the nearest settlement, and as such, it does not conform to national or local policy regarding development. In particular, the proposal contravenes PPS7 and Policies GS1, GS2 and CF2 of the Vale of White Horse Local Plan 2011.
- 2.22 While there is no specific mention of crematoria in the development plan, it should be emphasised that in the Inspector's Report into the adoption of the Local Plan, the Inspector remarked that any new crematorium development would have to comply with Policy CF2.
- 2.23 It should be recognised that due to the requirements of the Cremation Act of 1902, urban sites for new crematoria are unlikely to be possible and few appropriate sites are likely to come forward which are entirely in conformity with the development plan. Rural sites are therefore more common locations for new development of this type.
- 2.24 The requirement for a needs assessment in relation to the development of crematoria is not explicitly stated either in national policy or in local policy. Nevertheless, appeal decisions in previous cases in Cornwall and Staffordshire have established the precedent that need must be a material consideration when assessing applications of this nature. The applicant has therefore carried out a needs assessment for the proposed development; this is discussed in detail in the next section of our report



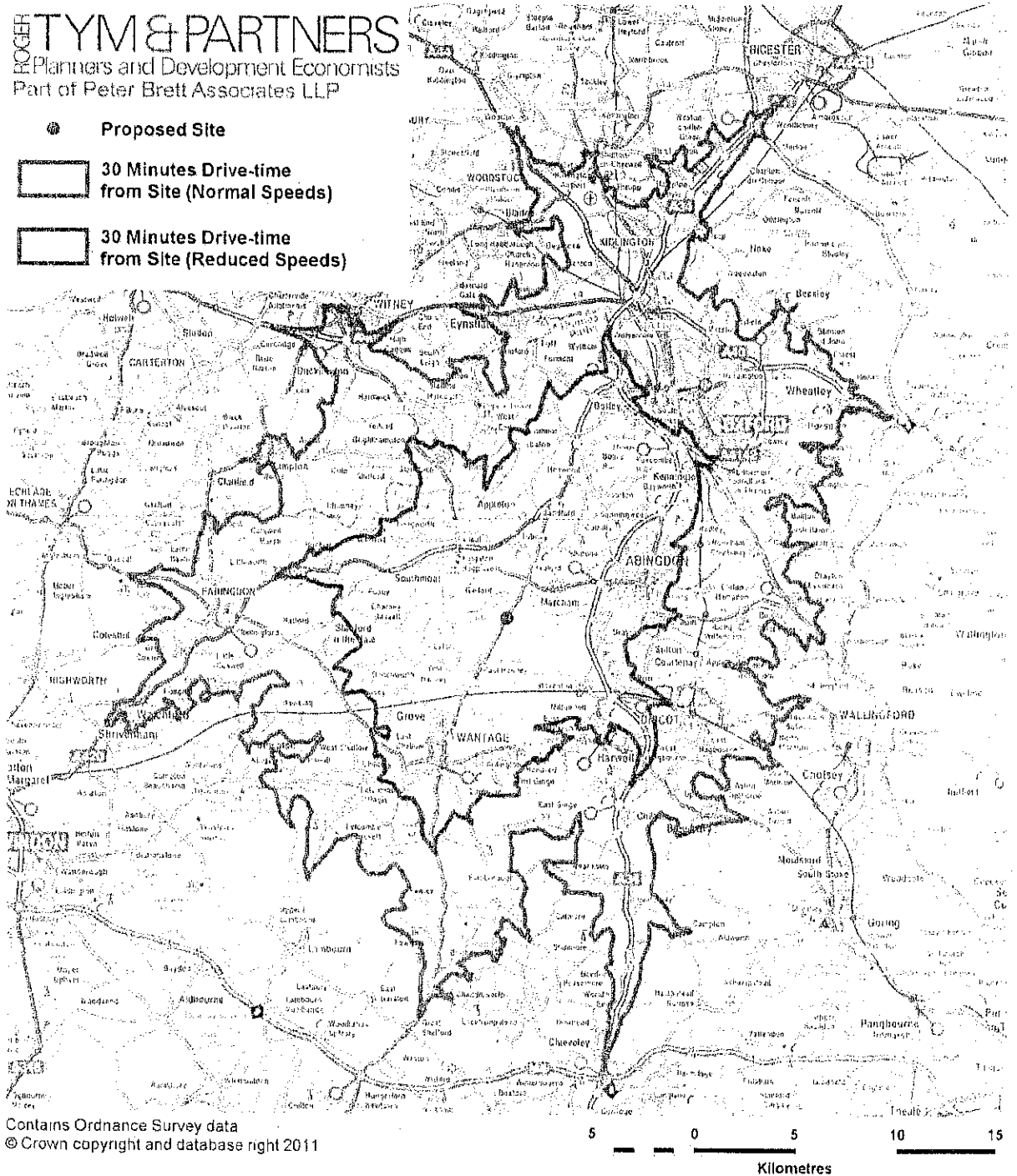
### 3 ASSESSMENT OF NEED

- 3.1 The applicant has commissioned LM to prepare a quantitative needs assessment to support its application. We have carried out an audit of this assessment and provide our findings below. Note that when discussing tables in the Leisure Markets report we prefix 'LM' and use the original two-digit label (for example, LM Table 2.3).

#### Needs Assessment

- 3.2 Section 2 of the LM report provides an overview of the demographic trends in the area which the proposed crematorium could be expected to serve. The LM report defines catchment areas by reference to 15-, 30- and 45-minute drivetimes from the proposed crematorium. LM identifies populations of 26,575, 290,172 and 596,201 within the 15-, 30- and 45-minute drivetimes. We have carried out a similar analysis, using the figures set out in Appendix A of the needs assessment, and confirm that these figures are appropriate. Indeed, LM's analysis of these drivetimes is conservative, as it uses speeds appropriate to a funeral cortege; our analysis shows that an assessment of this area at more regular speeds would give rather higher populations of 52,163, 356,862 and 769,865 persons for 15-, 30- and 45-minute drivetimes, respectively. Figure 3.1 below illustrates a 30-minute drivetime from the site at normal and reduced speeds.
- 3.3 It should be noted that at this stage of the LM analysis, the locations of competing crematoria are not being taken into account. Much of the population identified in these catchment areas is closer to another crematorium elsewhere (for example, Oxford crematorium), so the actual population which the proposed crematorium could be expected to serve is much smaller. The effect of competing crematoria on the catchment for the proposed crematorium is discussed in Section 3 of the LM report. The demographic data considered in this section are therefore of use largely for contextual purposes.
- 3.4 However, in the Cornwall case, the Inspector concluded that a population of 150,000 persons within 'a realistic travel time' of a crematorium was sufficient to allow the facility to operate.
- 3.5 LM Table 2.1 shows demographic data within these catchment areas. The age structure of the population within the 30-minute drivetime identified by LM is broadly typical of that for England as a whole, and has a relatively high proportion of its population within the higher socio-economic groups, particularly the AB group. There are relatively low levels of ethnic minorities within the 30-minute drivetime, and it is therefore reasonable to assume that cultural restrictions on cremation (as, for example, in Islam) are not particularly important here.

**Figure 3.1: 30 Minute Drive-Time Isochrone from the Application Site**



3.6 LM then discusses trends in ages and standardised death rates across the four local authorities covered by the minimum drivetime catchment as set out in section 3 (discussed below). LM Figure 2.1 shows the projected age trends of the four local authorities which are covered by its defined catchment area. It can be seen that the proportion of the population of these districts over the age of 65 is projected to grow significantly over the period to 2033. LM states that *'this would imply that death rates are likely to increase'*.

However, this is something of an over-simplification. As can be seen in Table 3.1 below, across these four districts, the crude death rate initially declines in the period to 2025, before rising again in the period 2025-2033, and despite the increase in population across the Districts, the absolute number of deaths remains static for the bulk of the period in question. Nevertheless, there is a slight rise in the total number of deaths across the Districts.

**Table 3.1 Populations and crude death rates in West Berkshire, South Oxfordshire, Vale of White Horse and West Oxfordshire**

		2008	2012	2016	2021	2026	2033
West Berkshire	Population (000s)	151.4	156.6	162.3	170.1	177.2	185.6
	Deaths (000s)		1.1	1.1	1.2	1.2	1.4
	Crude death rate		7.0	6.8	7.1	6.8	7.5
South Oxfordshire	Population (000s)	130.0	132.1	134.7	138.6	142.5	147.6
	Deaths (000s)		1.1	1.1	1.2	1.2	1.4
	Crude death rate		8.3	8.2	8.7	8.4	9.5
Vale of White Horse	Population (000s)	118.1	120.1	122.6	126.3	130.0	134.6
	Deaths (000s)		1.0	1.0	1.0	1.1	1.2
	Crude death rate		8.3	8.2	7.9	8.5	8.9
West Oxfordshire	Population (000s)	102.1	106.0	110.0	115.1	119.9	125.7
	Deaths (000s)		0.9	1.0	1.0	1.1	1.3
	Crude death rate		8.5	9.1	8.7	9.2	10.3

Source: 2009-based sub-national population projections, ONS 1010

### Minimum Drivetime Catchment Analysis

- 3.7 Section 3 of the LM report examines the minimum drivetime catchment (MDC) area – that is, the area within which drivetimes to the proposed crematorium at Garford are less than to other existing facilities. This is a more appropriate way of identifying likely numbers of cremations at the proposed facility than the simple consideration of population within a given drivetime. Of course, it is unlikely that 100 per cent of bereaved families within the MDC would choose the new facility at Garford; many would no doubt have other reasons than proximity for choosing a crematorium, and may want to go elsewhere. Equally, though, a well-run and attractive facility at Garford may be able to attract custom from outside of the MDC. For this reason, we consider an assessment of likely custom based on population figures within the MDC to be appropriate and we endorse the approach.
- 3.8 LM identifies a population of 177,098 within this MDC. This population is split between the Districts of Vale of White Horse (accounting for 50 per cent of the population of the MDC), South Oxfordshire (26 per cent), West Oxfordshire (21 per cent) and West Berkshire (4 per cent).
- 3.9 LM identifies the population, change in population since 2001, population within the catchment area, crude death rate and overall number of deaths for the years 2009 (LM Tables 3.2 and 3.5), 2021 (LM Tables 3.3 and 3.6) and 2033 (LM Tables 3.4 and 3.7). These figures are then fed into LM Table 3.7 to provide an overall number of deaths in these years within the catchment areas, and a 'cremation ratio' of 75 per cent is applied to give an overall number of cremations. This figure is unsourced; however, according to the Cremation Society of Great Britain, in the last year for which figures are available (2000), approximately 437,600 cremations took place in the UK, which represents 70.9 per cent of

all funerals<sup>3</sup>. To take a conservative approach to assessing need, a cremation ratio of 70 per cent may therefore be more appropriate.

- 3.10 Some of the tables produced by LM are of unclear provenance or contain errors. Table LM 3.2, which sets out death rates in the relevant local authorities, references the ONS 2009-based sub-national population projections; however, this source does not show death rates to the level of detail given in the table. A more accurate source for this data is the dataset 'Population Estimates for UK, England and Wales, Scotland and Northern Ireland, mid 2009' (ONS, 2010). This source gives figures very close (but not identical) to that set out in LM Table 3.2. We have used these data as the basis for our analysis in Table 3.1 below. Consequently, our figures for deaths within the MDC in 2009 are slightly (though not significantly) different from those set out by LM.
- 3.11 LM Tables 3.5, 3.6 and 3.7 give the expected populations and death rates within the MDC in 2009, 2021 and 2033, and consequently the expected number of deaths. This has been done by using the ONS 2009-based sub-national population projections for the local authorities covered by the MDC, assuming that population growth and death rates are constant across the whole of the authorities concerned. This is quite a crude approach, but is probably the best that can be done with the available data. However, the figures in LM Tables 3.6 and 3.7 relating to population growth in the period to 2021 and 2033 are incorrect for all districts apart from Vale of White Horse (they appear to have just been copied from the 2009 figures and not updated.) Consequently, the true figures for number of deaths within the MDC in 2021 and 2033 are actually rather higher than identified by LM.
- 3.12 We have carried out a similar analysis to LM, addressing the issues discussed above. The results are set out in Tables 3.2 to 3.6 below. These show that even taking the slightly more conservative cremation ratio of 70 per cent, the expected number of cremations based on the population from the MDC will amount to around 1,139 by 2021 and 1,382 by 2033 (roughly equal to the figures identified by LM).

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<sup>3</sup> <http://www.srgw.demon.co.uk/CremSoc/GeneralInformation/Know.html>

**Table 3.2 Populations and expected number of deaths and cremations within the MDC, 2009**

2009								
Local Authority	Total population of District ('000)	Local authority population change since 2001	Population in catchment area	Deaths in Local Authority	Deaths within catchment area	Crude death rate per 1000	Cremation ratio	Expected number of cremations
Vale of White Horse South Oxfordshire District	118,719	102.67%	91,152	926	711	7.80	70%	498
West Oxfordshire District	130,572	101.86%	46,324	1,094	388	8.38	70%	272
West Berkshire	102,496	107.17%	38,935	915	348	8.93	70%	243
	152,980	105.88%	6,894	1,053	47	6.88	70%	33
<b>Total</b>			<b>183,305</b>		<b>1,494</b>			<b>1,046</b>

**Table 3.3 Populations and expected number of deaths and cremations within the MDC, 2016**

2016								
Local Authority	Total population ('000)	Local authority population change since 2001	Population in catchment area	Deaths in Local Authority	Deaths within catchment area	Crude death rate per 1000	Cremation ratio	Expected number of cremations
Vale of White Horse South Oxfordshire District	122,600	106.03%	94,132	1,000	768	8.16	70%	537
West Oxfordshire District	134,700	105.08%	47,788	1,100	390	8.17	70%	273
West Berkshire	110,000	115.01%	41,786	1,000	380	9.09	70%	266
	162,300	112.33%	7,314	1,100	50	6.78	70%	35
			<b>191,020</b>		<b>1,587</b>			<b>1,111</b>

**Table 3.4 Populations and expected number of deaths and cremations within the MDC, 2021**

2021								
Local Authority	Total population ('000)	Local authority population change since 2001	Population in catchment area	Deaths in Local Authority	Deaths within catchment area	Crude death rate per 1000	Cremation ratio	Expected number of cremations
Vale of White Horse South Oxfordshire District	126,300	109.23%	96,973	1,000	768	7.92	70%	537
West Oxfordshire District	138,600	108.12%	49,172	1,200	426	8.66	70%	298
West Oxfordshire District	115,100	120.35%	43,723	1,000	380	8.69	70%	266
Berkshire	170,100	117.73%	7,665	1,200	54	7.05	70%	38
			197,533		1,627			1,139

**Table 3.5 Populations and expected number of deaths and cremations within the MDC, 2026**

2026								
Local Authority	Total population ('000)	Local authority population change since 2001	Population in catchment area	Deaths in Local Authority	Deaths within catchment area	Crude death rate per 1000	Cremation ratio	Expected number of cremations
Vale of White Horse South Oxfordshire District	130,000	112.43%	99,814	1,100	845	8.46	70%	591
West Oxfordshire District	142,500	111.16%	50,556	1,200	426	8.42	70%	298
West Oxfordshire District	119,900	125.37%	45,547	1,100	418	9.17	70%	293
Berkshire	177,200	122.64%	7,985	1,200	54	6.77	70%	38
			203,901		1,742			1,220



**Table 3.1 Table 3.6 Populations and expected number of deaths and cremations within the MDC, 2033**

2033								
Local Authority	Total population ('000)	Local authority population change since 2001	Population in catchment area	Deaths in Local Authority	Deaths within catchment area	Crude death rate per 1000	Cremation ratio	Expected number of cremations
Vale of White Horse South Oxfordshire District	134,600	116.41%	103,345	1,200	921	8.92	70%	645
West Oxfordshire District	147,600	115.14%	52,365	1,400	497	9.49	70%	348
West Berkshire	125,700	131.43%	47,750	1,300	494	10.34	70%	346
	185,600	128.46%	8,364	1,400	63	7.54	70%	44
			211,824		1,975			1,382

Sources for the above tables: 2009 population and death data from ONS 2009 mid-year estimates (2010); population and death data for subsequent years (including expected population growths from 2001) from ONS 2009-based sub-national population projections.

- 3.13 The preceding discussion has shown that the LM forecasts of deaths in 2021 and 2033 are actually rather lower than the figures that can be inferred from ONS projections. It may be appropriate to take a more conservative approach than LM has done in estimating the proportion of these deaths which will result in cremation; however, even if this lower figure is used, we would expect a demand for around 1,100 cremations by 2021 and 1,400 cremations by 2033. When compared with numbers of cremations at neighbouring crematoria as set out in LM Table 2.3, these figures represent a reasonably high level of demand for a crematorium at a location close to that proposed at Garford, demonstrating a quantitative need for the facility.

### Qualitative Factors

- 3.14 In its Planning Statement, the applicant discusses several qualitative factors which affect the need for a crematorium in Vale of White Horse District. We discuss each of these factors in turn below.

#### *Views of Council*

- 3.15 The applicant states in its Planning Statement that '*Vale of White Horse has expressed a need for the provision of a crematorium at a corporate level which stems from the need to provide residents with the choice of a more accessible cremation service*'. We understand that this stems from a conversation between the applicant and senior officers at the Council prior to the application, in which general support for the principle of a crematorium in the District was expressed. This did not relate to any particular site within the District, and was not a formal identification of a need for a crematorium within the Vale, and this position is not expressed in any extant policy document.

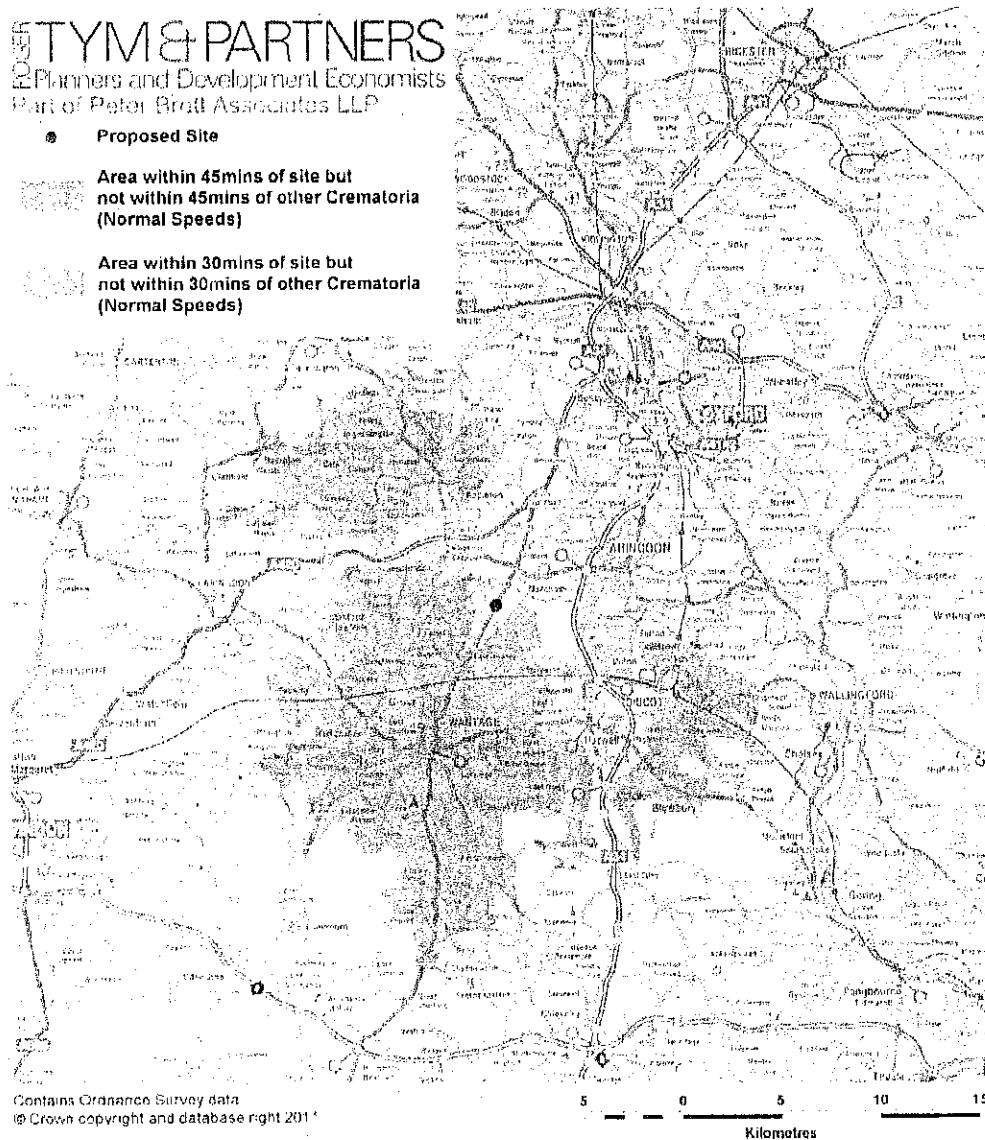
- 3.16 It should also be noted that in the Inspector's Report into the adoption of the Local Plan (2006), the Inspector commented that *'there is no current evidence of any overall lack of crematorium facilities serving the District. Consequently, I see no need to allocate land for a new crematorium at Marcham or anywhere else in this plan.'* However, circumstances may have changed in the intervening period since 2006, and will continue to change as the demographic structure of the District changes.

#### *Journey Times*

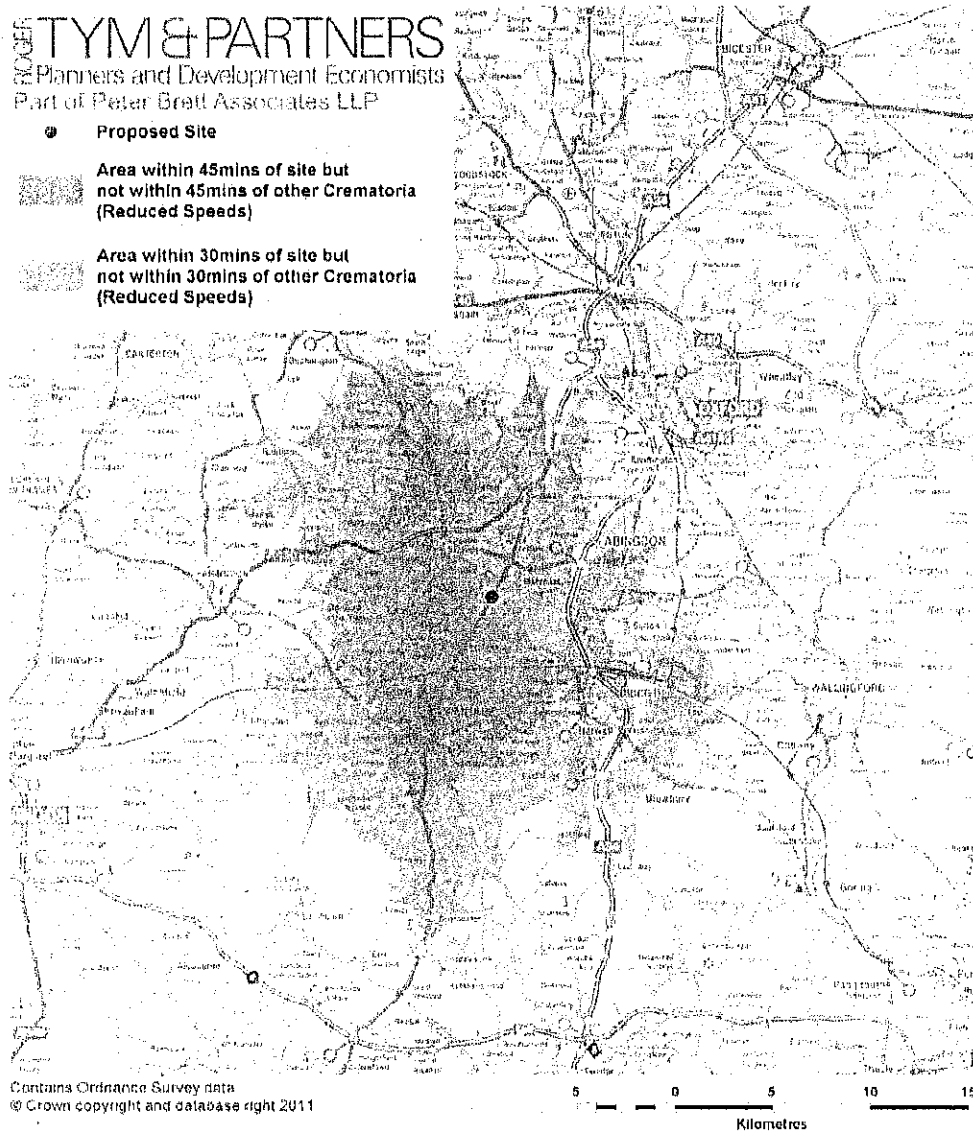
- 3.17 In its Planning Statement, the applicant states that the nearest crematorium by journey time from the centre of the District is still unacceptably distant according to Government standards. There are no hard and fast standards in place for journey times; however, in the case in Cornwall referred to earlier, the Inspector stated that *'in previous crematorium cases an industry standard, or "rule of thumb", has been applied at 30 minutes travel time for the funeral cortege. It has not been rigidly applied in all cases and in this area, with its dispersed, low density population, I consider it need not be definitive of the populations served by the facility. Nevertheless it provides a starting point for the assessment of the quality of service provided to the bereaved.'* The study submitted in support of the Cornwall proposal case applies a factor of 0.6 to normal road traffic speeds to correct for cortege speeds, and the Inspector accepted this approach (although criticised the study for other reasons).

The applicant has not quantified the population which lies more than 30 minutes from any of the surrounding crematoria. However, we have carried out an analysis of this area, and in our assessment there is a population of around 50,000 in the area surrounding Garford which does not lie within 30 minutes' travelling time of an existing crematorium but would lie less than 30 minutes from the proposed facility at Garford. Indeed, if adjustments are made for speeds appropriate to a funeral cortege in the way described above, this population is in excess of 45 minutes travelling time from existing crematoria, but would be under 30 minutes from the proposed crematorium at Garford. These areas are illustrated in Figures 3.2 and 3.3 below. This area includes the towns of Wantage and Grove, as well as much of the town of Didcot, which is expected to grow significantly over the next 15 years. There would be a significant qualitative benefit for these populations in having a crematorium in the Garford area.

**Figure 3.2: Area Not Currently Within 30 and 45 Minute Drive-Times from Existing Crematoria (Normal Speeds)**



**Figure 3.3: Area Not Currently Within 30 and 45 Minute Drive-Times from Existing Crematoria (Reduced Speeds)**



**Environmental Benefits**

3.18 A new crematorium in Vale of White Horse will allow shorter journey times for mourners from the much of the District. However, funerals typically draw mourners from a wide catchment area, and a large proportion of mourners at any funerals which may take place at the proposed development are likely to be from outside the District. Moreover, the existing crematoria with which the new facility is likely to compete are more accessible from locations outside the District, and are more accessible by public transport than the proposed facility at Garford. It is therefore difficult to quantify whether a new facility at Garford is likely to result in reduced overall journey times.

### *Service Standards*

- 3.19 The Planning Statement discusses the service standards at the various crematoria which currently serve the population of Vale of White Horse. The fact that 45 minute service times are available only at Oxford Crematorium is an indicator of qualitative need for greater crematorium provision in the area, as is the fact that cremation times can be hard to come by at Swindon. There seems to be demand among funeral directors for another crematorium similar to Thatcham – that is, of modern design and set in a rural setting. All of these issues indicate a qualitative need for a crematorium in Vale of White Horse; however, none of them are by themselves particularly strong factors, and none of them demonstrate the strength of qualitative need shown in the Cornwall case.

### *Views of Funeral Directors*

- 3.20 The funeral directors surveyed by the applicant were broadly of the opinion that greater crematorium provision is needed in the area. It is to be expected that funeral directors are likely to be of this view – as it is to be expected that operators of rival facilities are likely to be of the opposing view – but that does not mean these views should not be taken into account.

### **Needs Assessment – Conclusion**

- 3.21 Our analysis of the needs assessment undertaken by Leisure Markets has shown that it is reasonable to expect a throughput of around 1,000 cremations per year at the proposed crematorium in Garford, rising to around 1,100 cremations per annum by 2021 and 1,400 cremations per annum by 2033. This figure is of a similar order to other surrounding crematoria, and demonstrates a quantitative need for such a facility within the defined catchment area.
- 3.22 The qualitative case is more complex. We consider that the most significant qualitative issue is the area of the District which is over 45 minutes from an existing crematorium (at speeds appropriate for funeral corteges). This area currently contains a resident population of around 50,000, and this population is likely to increase over the forthcoming years. This is a material consideration demonstrating a qualitative need for crematorium provision in the District.
- 3.23 Additionally, there appears to be a demand amongst funeral directors (and, we may infer, amongst mourners) for modern facilities in a rural setting along similar lines to the crematorium at Thatcham. Moreover, there is a case to be made for a new crematorium in the sub-region in order to allow 45 minute services to be held. Both of these issues lend further weight for the qualitative case for new crematorium facilities in the District.
- 3.24 Overall, therefore, we consider that there is both a quantitative and qualitative need for greater provision of crematorium facilities for the population of the District.