



## Newham London Borough Council Burial Space Need and Provision Study

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**Newham London Borough Council**

CRM.610.PL.R.001



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# London Borough of Newham Council Burial Study

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## Glossary

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**Consecrated Land** - ground that has been made or declared sacred or holy and is therefore suitable for Christian burial.

**Cremation** - the disposal of a dead person's body by burning it to ashes, typically after a funeral ceremony.

**LBN** - London Borough of Newham

**Mausoleum** - A mausoleum is an external free-standing building constructed as a monument enclosing the interment space or burial chamber of a deceased person or people.

**Interment Capacity** - Interment Capacity refers to the total number of burials or interments that can be accommodated within a cemetery, mausoleum, or other burial grounds. This capacity takes into account various factors such as:

1. Available Space: The physical space available for graves or crypts.
2. Regulations and Zoning: Local, regional, or national regulations and zoning laws that may limit the number or type of interments allowed.
3. Types of Interment: Different interment methods (e.g., traditional in-ground burial, cremation niches, mausoleum crypts) which may have different space requirements.
4. Land Utilization: How efficiently the land or space is used, including the layout and design of the burial plots or spaces.
5. Future Provisions: Consideration for future expansions or planned usage of the cemetery or burial grounds.

**Spatial Patterns of Interments** - Spatial Patterns of Interments refers to the arrangement and distribution of burial sites within a cemetery or burial ground. This concept encompasses several aspects, including:

1. Layout Design: The overall design and organization of burial plots, which can vary from linear rows to more complex, non-linear patterns.
2. Density: The concentration of interments in different areas, indicating how densely or sparsely the plots are distributed.
3. Zoning: Division of the cemetery into different sections based on criteria such as religious affiliation, type of interment (e.g., in-ground burial, mausoleum), or historical significance.
4. Orientation: The directional placement of graves or crypts, which can be influenced by cultural, religious, or aesthetic considerations.
5. Accessibility: The arrangement of pathways, roads, and open spaces to ensure accessibility and ease of movement within the cemetery.
6. Cultural and Historical Influences: How cultural practices, historical events, or local customs shape the spatial distribution of interments.

**Social infrastructure** - refers to facilities and services that support the quality of life in a community. This includes schools, hospitals, community centres, and other services such as burials and cremations, which support the social needs of the population.

**Open space** - encompasses areas of land that are not built upon and are used for recreation, leisure, and environmental conservation. These spaces can include parks, gardens, playgrounds, and natural reserves.

**Intensification of Cemetery** - The intensification of a cemetery refers to the process of optimizing the use of existing cemetery space to accommodate more burials and memorials, often through innovative and efficient methods. This can include various strategies such as:

1. **Reusing Graves:** Allowing graves to be reused after a certain period, common in places with limited space.
2. **Cremation and Ash Interment:** Encouraging cremation and the interment of ashes in smaller plots or niches.
3. **Space Optimization:** Reconfiguring existing plots and pathways to create more efficient layouts and increase the number of available plots.

**Virgin burial land** - Refers to a parcel of land that has never been used for burials before. It is untouched and unaltered, specifically designated and prepared for the purpose of creating a new cemetery or burial ground. This land is typically undeveloped and free from prior graves, ensuring that it is in its natural or original state before being utilized for burial purposes.

## 1.0 Introduction

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### 1.1 Introduction

- 1.1.1 The London Borough of Newham (LBN) (Newham Council) instructed Enzygo to prepare a Burial Study assessing and reporting on the suitability of sites within Newham or under the ownership of LBN for additional burial facilities, with specific reference to the demographic profile and burial needs of the Newham community.
- 1.1.2 The London Borough of Newham covers approximately 36.21 km<sup>2</sup> of East London. As such, the Borough contains widely varying types of development within a small geographical area. Combining a high intensity of land use, land constraints such as Metropolitan Open Land, Green Belt, considerable housing and employment targets established by the London Plan 2021 and large population within the Borough. This means that careful spatial planning within Newham is crucial.
- 1.1.3 Like many Councils particularly in Greater London, Newham Council is aware of concerns from residents and others about the availability of appropriate spaces for burials and the interment of ashes. LBN recognise the need to understand existing burial capacity within the Borough boundary and the opportunity for residents of Newham to use burial space within adjoining authority areas. This will help to establish how much capacity will be required within and beyond the Local Plan period and identify opportunities for sufficient provision to meet the future needs of its residents.

### 1.2 Study Background

- 1.2.1 This piece of work has been commissioned to to meet the requirements of **London Plan (2021) policy S7** and to support the implementation of **Policy SI5: Burial Space and Related Facilities**, in the draft submission local plan, by providing further evidence to support interested parties in assessing the suitability of land within the Borough of Newham for burial use,.
- 1.2.2 The purpose of the study has been to:
- Assess future burial needs in the borough by reviewing population trends.
  - Look at available space in existing burial grounds, including through intensification or re-use of graves.
  - Assess whether there are any suitable sites within the borough that could come forward to address future needs, including cemetery extensions. Any assessment of suitability must consider the council's identified needs and nationally and regionally set targets for homes, employment and infrastructure provision.
  - Identify existing burial space outside the borough, but within a reasonable travel distance (45 min), that may have capacity for use by Newham residents.

- 1.2.3 LBN recognise the need to understand existing burial capacity within the Borough boundary and establish how much capacity will be required. This study meets the requirements set out in London Plan (2021) policy S7 and builds on the Audit of London Burial Provision (2011). The Audit of London Burial Provision (2011) concluded Newham's provision of burial space needs to be 'sustainable', however the Council has recognised that a more up to date review of need is required and has therefore commissioned this study to consider burial needs and potential suitable sites to meet any unmet need.
- 1.2.4 It is also recognised that this study will be used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.
- 1.2.5 This study is the first phase to identify any potential suitable sites, and any site or sites that are identified within an existing cemetery for intensification, or an extension or a potential new cemetery site, then a more detailed second phase will still be required to examine the suitability of the site in more detail.

### **Population Background**

- 1.2.6 An active consideration of requirements for future burial space needs in spatial planning terms needs to be applied periodically to make appropriate provision in local plans and through development. To properly plan for the future burial needs for Newham, it's important to understand the relevant data. This includes analysing a range of data sources including:
- Population Change
  - Death rate
  - Estimates of future numbers of deaths
  - Religious demographics in the borough
- 1.2.7 The Office for National Statistics (ONS) indicate that the population of the London Borough of Newham is projected to increase from around 355,000 in 2021 to nearly 440,000 by 2051<sup>1</sup>, an increase of more than 23%. The main driver of the projected growth in is immigration. The borough has a diverse and multicultural population, and this is likely to continue as it attracts migrants from all over the world. The ONS predicts that net international migration will be the main contributor to Newham's population growth, accounting for more than half of the increase over the next 30 years<sup>2</sup>.
- 1.2.8 LBN is a young and populous borough with a diverse population including a large and growing Muslim community. According to the ONS 2021 Census data, Newham has a Muslim

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<sup>1</sup> [Newham population change, Census 2021 – ONS](#)

<sup>2</sup> [2021 Census Profile for areas in England and Wales - Nomis \(nomisweb.co.uk\)](#)

population of 122,146 which translates to 34.8% of the total population; Christian 123,746 (35.3%); and Hindu 21,405 (6.1%)<sup>3</sup>.

1.2.9 The religious diversity of LBN's population highlights the need for the council to consider the religious and cultural practices of its residents when making decisions about community services and facilities. In estimating the demand for burial space, it is necessary to consider the specific requirements of different religions when planning new cemeteries or burial grounds. This is dealt with in more detail in Section 3.

### 1.3 Adopted Methodology

1.3.1 The study methodology comprises the following key stages:

- Stage 1: An assessment of the policy context and environmental considerations and requirements for new burial sites.
- Stage 2: Identify the projected need for burials amongst Newham residents from different communities for the period 2023-2038.
- Stage 3: Identify the opportunities within any existing burial sites in the borough for expansion or re-dedication of vacant plots (noting requirements for virgin land).
- Stage 4: The identification of any suitable additional sites within the borough that could serve as burial sites either within or outside the Council's ownership.
- The structure of this report is defined by each key stage.

#### **Stage 1: An analysis of the policy context and identification of environmental requirements.**

- Stage 1 involves reviewing the legal framework in relation to burials and space for cremation ashes, along with relevant national and local planning policy. A review of Burial Law, NPPF (2023), The London Plan (2021) and Local Planning Policy has been undertaken. A review of the local, national and regional planning policies has informed the later stage of the study to identify suitable sites.
- Regional Requirements - although the New Local Plan is for Newham, the burial needs assessment will consider adjoining authority's interment capacity and the spatial patterns of interments across Council boundaries. Understanding interment capacity is crucial for cemetery management to ensure adequate planning for current and future needs, as well as for financial and operational sustainability.
- To do this, this study reviews whether adjoining authorities have undertaken burial needs assessments or have considered burial needs as part of their local plan and identified available burial sites within acceptable travel times.

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<sup>3</sup> Date: 2021 | Source: ONS, Census 2021

**Stage 2: The identification of the projected need for burials amongst Newham residents from different communities for the period 2023-2038.**

- Enzygo has assessed the historic population trends and future population forecasts, mortality within the Borough and an assessment of the different faith groups.
- Utilising the baseline of existing burial plots provided by Newham Council and the Audit of London Burial Provision (GLA 2011)<sup>4</sup>, an estimated surplus or deficit of burial spaces for each religion within the Borough for the period 2023-2038 is calculated.

**Stage 3: The identification of opportunities within any existing burial sites in the borough for intensification, expansion or re-dedication of vacant plots (noting requirements for virgin land)**

- Enzygo has undertaken a desktop study using aerial imagery to identify the feasibility of extending existing burial sites. The suitability of extending the existing sites has been undertaken on a site-by-site basis, as it depends upon a wide range of factors, including the surrounding land use, potential environmental impacts caused by extensions, and the current uses and roles fulfilled by such land.
- Enzygo has investigated whether there is any opportunity to intensify the use of existing burial sites utilising existing information provided by Newham Council regarding the potential intensification of existing sites and the remaining plots available within Council owned cemeteries within the Borough.

**Stage 4: The identification of any additional sites within the borough that could serve as burial sites within or outside the Council's ownership.**

- Enzygo has undertaken a site search of potential suitable burial sites based on a minimum area of 3 hectares (ha), identified through the surplus vs demand study in stage 2. To identify the additional burial space required, the UK Government estimates that a typical municipal cemetery accommodates 1,976 graves per hectare<sup>5</sup>. This formula has been used to identify the additional cemetery space required in Newham.
- Enzygo has undertaken a desktop site search for suitable sites. Consideration has been given to all identifiable constraints. This includes:
  - An agreed site area - ideally a minimum of 3.0 ha
  - Local Plan Policies - Land Availability: Finding suitable land that could be available for purchase or lease and is not already designated for other critical uses.
  - Green Belt and Metropolitan Open Land - involves balancing the need for burial spaces with the purposes of Green Belt
  - Open Space - maintaining current open space is an important consideration spatial planning for the borough as part of the local plan process.

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<sup>4</sup> [An Audit of London Burial Provision](#)

<sup>5</sup> <https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>

- Archaeology and Conservation - Identifying and preserving any historical or archaeological sites within the proposed area
  - Flood Zones 2 & 3 - Avoiding areas prone to flooding to prevent grave disturbance and environmental contamination
  - Surface water flooding - Avoiding areas prone to surface water flooding to prevent grave disturbance and environmental contamination
  - Ecology (identified from available online sources<sup>6</sup>) preventing disturbance to ecologically important sites
  - Soil/Geology - Suitable soil for burials, avoiding areas with high clay content or rocky terrain.
  - Hydrology (identified from available online sources) - Maintaining a safe distance from rivers, lakes, and other water bodies to protect water quality)
  - Landscape – Considering the visual appearance of an area, contributing to its overall attractiveness (identified from available online sources)
  - Highways and public transport - Accessibility: Ensuring good transportation access for funeral processions, visitors, and maintenance services (identified from available online sources)
- The identified sites have been numbered. Any site or sites that are identified within an existing cemetery for intensification, or an extension or a potential new cemetery site, will still require a more detailed second phase to examine the suitability of the site in more detail. The matrix in Appendix 4 is a tool which should be used for all future site assessments.

#### **Stage 5: Summary and Conclusion**

- A summary report has been prepared which summarises findings of the above stages.

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<sup>6</sup> Land Insight & SearchLand

## 2.0 Legal Requirements and Planning Policy

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### 2.1 Introduction

- 2.1.1 This chapter details the legal framework in relation to burials and space for cremation ashes, together with an analysis of the relevant national and local policy context and identification of environmental requirements.
- 2.1.2 Burial facilities can be considered both a form of social infrastructure and a part of open space provision. Burial facilities, such as cemeteries, serve an essential role in society by providing a place for the respectful and dignified treatment of the deceased. They are important for cultural, religious, and personal reasons, offering a space for mourning, remembrance, and community gatherings.
- 2.1.3 Cemeteries and other burial grounds also often function as green spaces within urban and rural areas. They can provide ecological benefits, such as supporting biodiversity, acting as carbon sinks, and contributing to the urban green network. Additionally, they offer recreational opportunities for walking and quiet reflection. However, they don't have the same functionality as other forms of open space, such as parks or sports pitches and have better functionality for quiet contemplation, especially if closed.
- 2.1.4 Cemeteries are considered to be Use Class Sui Generis uses for planning purposes. "Sui generis" is a Latin term meaning "of its own kind" and is used for uses that do not fall within the specific classes defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments. This classification indicates that cemeteries are recognised as having a unique use that does not fit neatly into other categories. Consequently, planning permission would be required for a new cemetery or cemetery extension.

#### **Burial Law**

- 2.1.5 The Ministry of Justice is responsible for burial law and since the 1850s the national government has passed responsibility for burials on to local authorities. Despite this, there is currently no statutory duty upon Local Authorities to provide burial space for their residents, although there is a requirement for them to maintain existing cemeteries they own.
- 2.1.6 Currently, Local Authorities are not required by law to provide burial space for residents, but some councils have a management plan for space they manage. However, such provision is at the discretion of the relevant Local Authorities or other parties depending on historical provision or market demand. This study is looking at available space for future council and private sites and not producing an onward management plan for council owned sites.



- 2.1.7 However, several Acts of Parliament provide Local Authorities with legislative powers relating to burial land provision. The Local Government Act 1972 recognises Local Authorities as burial authorities, along with the Cremations Act of 1902 and 1952 (Section 214 (1) and (5)). It allows burial authorities to provide and maintain cemeteries inside and outside of their administrative areas (Section 214 (2)) and to contribute towards any expenses incurred by third parties in providing or maintaining a cemetery in which the residents of the authority's area may be buried (Section 214 (6)).
- 2.1.8 Section 74 of the London Local Authorities Act (2007) allows the re-use of graves as:
- 1) where a burial authority has extinguished –
    - (a) a right of burial in a grave space under section 6 (power to extinguish rights of burial in cemetery lands) of the Act of 1969; or
    - (b) a right of interment in respect of a grave under section 9 of the Act of 1976, the burial authority may disturb or authorise the disturbance of human remains interred in the grave for the purpose of increasing the space for interments in the grave. No human remains may be disturbed under this section if they have been interred for a period less than 75 years'.
- 2.1.9 Legislation to permit reclamation of grave space was established under S9 of the Greater London (General Power) 1976. This permits burial authorities in London to extinguish burial rights in graves where no burial has taken place for 75 years, where unused space within the grave could then be used for the purpose of further burials. This process does not disturb any existing remains in the grave; hence it is termed 'reclamation'.
- 2.1.10 Section 25 of the Burial Act 1857 does not apply if the following condition is employed 'the body or remains is or are removed in accordance with a faculty granted by the court'.
- 2.1.11 London Burial Authorities have the power to re-uses graves and this re-use takes place 'under faculty in consecrated sections of the site under Ecclesiastical law. Here, the local authority disinters any remains, and reinters them in a 'designated' grave at the end of the row, so releasing the original grave for use by another family. The last interments in the re-used graves will have taken place at least eighty years ago. The local authority conducts re-use according to strict protocols. The last interment will have taken place at least eighty years ago. (Commons Library Research Briefing, 2023; The Cemetery Research Group, 2024).
- 2.1.12 As stated above, in specified circumstances, burial authorities in London may reclaim a private grave and then use the remaining space in it for the purpose of further burial, where the burial rights have not been exercised for 75 years or more and notice has been published. London burial authorities also have power to disturb remains in private graves older than 75 years for the purpose of deepening the grave to allow further burials to take place. The power to re-use graves is a sustainable and limited response to the shortage of burial spaces in London, which, additionally, would generate new income to help pay for ongoing maintenance of

established cemeteries. Where possible, the re-use of graves in existing cemeteries in the Borough should be carried out to help reduce the need for burial space.

- 2.1.13 Regarding other burial legislation, the Environment Agency<sup>7</sup> are involved in the regulation of new cemetery developments and existing cemeteries. The agency ensures that the operations of cemeteries pose no harm to the environment, especially in terms of groundwater pollution. Should pollution occur, the Environment Agency will act proportionately and appropriately to the harm being caused.

## 2.2 Policies Relating to Burial Space

### National Planning Policy Framework (NPPF), 2023

- 2.2.1 The National Planning Policy Framework (NPPF) (2023) sets out the current Government's planning policies for England. Sustainable development lies at the core of the NPPF, which requires economic, social and environmental roles to be considered for all aspects of development. The NPPF must be considered to inform the identification of any suitable sites that are being considered as part of this study.
- 2.2.2 Within the NPPF whilst there is no specific reference to burial needs, other than Paragraphs 154 and 155, which relate to cemeteries within the Green Belt. Given that the City of London Cemetery and Crematorium in Newham Borough Council is located within Green Belt, this section is relevant.
- 2.2.3 Paragraph 154 states that the LPA 'should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... (b) the provision of appropriate facilities... for cemeteries and burial grounds... as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it'.
- 2.2.4 Paragraph 155 states 'Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are... (e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)...'.
- 2.2.5 **Chapter 13** of the NPPF '**Protecting Green Belt land**' aims to 'prevent urban sprawl by keeping land permanently open'. As mentioned above, cemeteries are considered acceptable development in the Green Belt; however, they must preserve its openness. This means that traditional lawn graves are viewed more favourably than Mausoleums, vaults and curbed graves.

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<sup>7</sup> [Cemeteries and burials: groundwater risk assessments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671422/Cemeteries_and_burials_groundwater_risk_assessments.pdf)

- 2.2.6 The provision of burial space must be in an appropriate location for the benefits to be fully achieved. Any sites identified should (if possible) benefit from existing infrastructure (i.e. access roads) or be in a location where infrastructure could be provided relatively simply (i.e. without the need for large levels of new infrastructure). A specific example of this is extending existing sites which already have the required infrastructure in place, as a preference to developing entirely new sites, which may not benefit from existing infrastructure.
- 2.2.7 In terms of providing a social role, Paragraph 8 states that development should ‘...support strong, vibrant and healthy communities...with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being...’. As stated above, burial facilities play an important role in the community and can be considered both a form of social infrastructure and a part of open space provision.
- 2.2.8 Given the urban context of Newham, pressure on land means it is even more important to ensure that open space resources meet multiple needs. When considering potential new sites any recommendations made within this study, it is important that they are consistent with the NPPF.

### **2.3 London Planning Policy**

- 2.3.1 Strategic planning in London is the shared responsibility of the Mayor of London, 32 boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor must produce a spatial development strategy (SDS), which is known as the London Plan.
- 2.3.2 The London Plan is legally part of each of London’s Planning Authority’s Development Plan and must be considered when planning decisions are taken in any part of greater London.
- 2.3.3 As Newham Borough Council is one of the 32 London boroughs’, this Burial Needs Assessment considers the adopted London Plan (2021) in full detail.
- 2.3.4 The Mayor of London also offers supplementary Planning guidance (SPGs) and other guidance which gives further detail on specific policies found in the London Plan. This too will be assessed in this chapter.
- 2.3.5 Overall, the key London planning policies and guidance are:
- The London Plan (2021)
  - Mayor of London Supplementary Planning Guidance (SPG) - Social Infrastructure Supplementary Planning Guidance (2015)

## The London Plan (2021)

- 2.3.6 The London Plan (2021) is the overall strategic plan for London, setting out an *'integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years'*.
- 2.3.7 This burial needs assessment has been conducted in line with the London Plan (2021) and the Social Infrastructure SPG (2015), specifically, **Chapter 5, Social Infrastructure** which includes burial needs. Where appropriate, the findings from the GLA Audit have been used as a starting point for this research.
- 2.3.8 Consideration has been given to the other key chapters and policies in the London Plan and dealt with in more detail in Section 2.6. These include, **Chapter 4, Housing, Chapter 6, Economy, Chapter 7, Heritage and Culture, Chapter 8 Green Infrastructure, and Natural Environment, Chapter 9 Sustainable Infrastructure, and Chapter 10 Transport.**
- 2.3.9 A key element of the Plan is social infrastructure, and this covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It emphasises that it is important to consider the way that social infrastructure integrates with other uses and facilities and the way people in the area want to access it.
- 2.3.10 It introduces a specific policy for burials, and this highlights that in assessing the requirements for burial space, a borough's needs assessment should take account of the fact that different faith groups have different needs for burial provision. For inner London boroughs, this requires them to seek provision in outer London or beyond. This may require a sub-regional collaborative approach to the provision of burial space, which in turn should inform a borough's assessment of current cemetery demand and site allocations for cemeteries in their Development Plans. The use of cross-borough agreements for collaboration are encouraged.
- 2.3.11 **Policy S7 'Burial Space'** states "When preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including for those groups for whom burial is the only option. This should be informed by a needs assessment of burial space, including an audit of existing provision and opportunities for the re-use of burial space".
- 2.3.12 The London Plan paragraph 5.7.3 states *'The re-use of graves can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them. The unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries'*. This should be considered when providing additional capacity in existing cemeteries. Any recommendations from this study which suggest an intensification or expansion of existing cemeteries must acknowledge this statement, to protect the heritage in the Borough.

- 2.3.13 This study for Newham Council is compliant with Policy S7 of the London Plan. The study acknowledges that certain graves have and will continue to be reused within Newham. It examines intensification, extension, and provision in adjoining authorities. Furthermore, as the results of the study have been broken down into the different religions, the needs of those who can only be buried have been fully assessed.
- 2.3.14 The London Plan argues that *'Boroughs should continue to make traditional burial provision but innovative approaches to the provision of community burial space, particularly in inner London, may also need to be taken. These could include creating public gardens for the burial of ashes on underused pockets of open land, parkland and brownfield land. Such gardens could also offer broader community utility, improved amenity provision and environmental enhancement'*. Although this is not a key consideration, the study acknowledges the potential for these types of innovative provisions in addressing the need for greater burial space in Newham.
- 2.3.15 Regarding **Policy G2, Green belt** is also a key consideration for this study as a balance must be made between offering burial spaces and protecting, promoting and enhancing open spaces and natural environments. Section 8.2.1 of the London Plan states that *'The Mayor strongly supports the continued protection of London's Green Belt'*.

### **Mayor of London Supplementary Planning Guidance (SPG) - Social Infrastructure SPG (2015)**

- 2.3.16 A key supplementary planning guidance is the Social Infrastructure SPG (2015), which includes chapter 8 Burial Needs. This elaborates on the London Plan (2018) and offers greater information, although the Social Infrastructure SPG has not been updated to match the policies of the most recent London Plan (2021). Despite this, it has not been revoked thus is still considered relevant guidance.
- 2.3.17 According to this SPG, approximately 75% of the deceased are cremated but this can vary significantly by faith. The SPG also reiterates the 2018 London Plan's Policy 7.23 regarding burial spaces and states the *'London Plan encourages local authorities to provide burial space in close proximity to their residents, to reduce the costs/time in travelling to visit deceased loved ones'*.
- 2.3.18 The SPG also considers the Audit of London Burial Provision (2011), which was commissioned by the Mayor in 2010 to assess the provision of burial space in Greater London. The GLA does not have data on how the number of burial spaces has changed since 2016. The findings of this Audit are considered in chapter 3.
- 2.3.19 The SPG chapter on burial needs also provides a summary of the laws relating to reclamation and re-use of graves, which has been highlighted at the beginning of this chapter.

2.3.20 Finally, the burial needs chapter of the Social Infrastructure SPG (2015) concludes that *'in implementing the London Plan policies and especially Policy 7.23, the mayor will, and boroughs and other partners are advised to:*

- *Consider the needs and capacity assessments for burial space set out in Figures 18 to 22 (findings from the GLA, Audit of London Burial Provision 2011)*
- *Consider the impact that different burial practises may have on the demand for new plots*
- *Promote reuse of existing plots where appropriate and within the scope of existing legal powers*
- *Where demand cannot be met locally, boroughs should cooperate in planning across their boundaries to deliver necessary burial land'.*

2.3.21 These burial needs assessment has been conducted in line with the London Plan (2021) and the Social Infrastructure SPG (2015) - specifically, the chapter on burial needs. Where appropriate, the findings from the GLA Audit have been used as a basis for this research; consideration has been made on the different type of religious needs regarding interment; the study acknowledges that plots may be reused; and the study considers cross border flows and the potential for duty-to-cooperate mechanisms to play a role in future needs.

## 2.4 Local Planning Policy

### **Newham Local Plan (2018 – 2033, adopted 2018)**

2.4.1 Newham's adopted Local Plan is comprised of:

- Newham Local Plan (2018)
- Local Plan Policies Map (2018)

2.4.2 The adopted Newham Local Plan sets out a vision and framework for development in the borough until 2033 and is currently the adopted Local Plan. Along with the London Plan, the Local Plan (2018) forms the Development Plan. Any proposals considering the provision of a new cemetery will be assessed against these policies first, with increasing weight afforded to the emerging Local Plan as it progresses.

2.4.3 The key policies that need to be addressed when looking at the burial provision in the Borough are:

- **Policy S1 'Spatial Strategy and Strategic Framework'** (b) states proposals which involve *'realising the potential and making best use of Newham's land, green space, blue ribbon network and heritage assets, connectivity, existing and emerging economic strengths'* will be supported.
- **Policies S2-S6** identify strategic sites, Notably, regarding **Policy S6 'Urban Newham'**, the council is recognised as a significant landowner in Newham and will seek *'where other opportunities arise to provide new/improved schools, community facilities or open space'*.

- 2.4.4 The need to locate burial space in places which are accessible to the population, and which can benefit from existing infrastructure, would indicate that, where possible, provision of new burial space should form part of the social and physical infrastructure of strategic growth areas identified by the Council in its local plans. Given the competition for land in the local urban context, it is likely that if such provision is possible in these areas, cemeteries will need to perform multiple functions beyond places of interment, as green spaces and places which can support bio-diversity enhancement.
- 2.4.5 **Policy INF6 ‘Green Infrastructure and the Blue Ribbon Network’** states ‘*Green infrastructure and the Blue Ribbon Network will be protected and enhanced*’. Also, ‘*The multiple roles and benefits of designated and undesignated Green Infrastructure will be maximised*’. There are sites present in the Borough which have been designated as ‘Protected Green Space’, for example the City of London Cemetery & Crematorium (Site GS3). All burial facilities in LBN are classified as open space.
- 2.4.6 **Policy INF7 ‘Open Space and Outdoor Recreation’** states ‘*Existing open spaces (including riverside access, allotments and burial space) and outdoor recreation facilities will be protected*’. Overall, the development of any new cemeteries or extensions to existing cemeteries in the Borough will have to be consistent with these policies, ensuring protection and enhancement of green infrastructure and ensuring that there is still a sufficient amount of multifunctional recreational open space.
- 2.4.7 This policy recognises that as population levels increase, so will pressures on existing spaces and given the relative scarcity of park space in Newham, there is limited opportunity to provide new open space. As such, the policy also contributes to the delivery of ‘good growth’ by ensuring essential social infrastructure provision is increased in tandem with population growth.
- 2.4.8 Maintaining current open space is an important consideration when planning for new cemeteries. There are several reasons why preserving open space is crucial and it is important to aim to balance all the competing needs for the different types of open space against the need for new burial sites.
- 2.4.9 By incorporating these considerations and strategies, it is possible to develop new cemeteries in a way that respects and maintains existing open spaces, providing benefits to both the environment and the community. However such open spaces cannot have the full functionality of parks and sports or play facilities.
- 2.4.10 **Policy INF8 ‘Community Facilities’** at Section 6.101 identifies burial spaces as community facilities. Additionally, Town and Local Centre for the development of community facilities will be prioritised. The Local Plan has identified Community Facilities Opportunity Areas (Table 14 of the Local Plan) and Community Facility Site Allocations (Table 15). As evidenced in Table 15, each site has been allocated with a primary community need and five sites have been recognised as ‘Community Centre / flexible community use’.

### **Local Plan Policies Map (2018)**

- 2.4.11 The Local Plan Policies Map identifies policy designations across the whole of the Borough. When reviewing sites, relevant designations will be considered to ensure proposal made through this report would not conflict with existing designations.

### **Draft Newham Local Plan (2023-2038)**

- 2.4.12 LBN is currently developing a new Local Plan and the Draft Submission Local Plan was reported to Cabinet in June 2024. The Draft Newham Local Plan will shape Newham across a 15-year period from 2023 – 2038 and contains the vision, objectives, spatial strategy and planning policy framework to address the challenges and make the most of opportunities which face Newham.
- 2.4.13 The submission Local Plan (Regulation 19) has been developed following responses received on the Issues and Options document, during the consultation held at the end of 2021, and on the draft Local Plan (Regulation 18), during the consultation held in January and February 2022. The new Local Plan is currently out for consultation until 6 September 2024.
- 2.4.14 The draft submission plan contains a new policy, **Policy S15: Burial Space and Related Facilities**.
- 2.4.15 The policy recognises the need to protect existing cemeteries and crematoriums to help meet Newham’s future burial needs. It also supports proposals to deliver new burial space and related facilities where they:
- a. meet the needs and requirements of Newham’s population, including for those parts of the community for whom burial is the only option;*
  - b. will not cause unacceptable amenity or highways impacts;*
  - c. adequately address environmental risks, including flood risk and land and water contamination;*
  - d. deliver any ancillary buildings at an appropriate scale and sensitive design; and*
  - e. are publicly accessible, with well-maintained and biodiverse landscaping.*

## **2.5 Other Policy considerations**

- 2.5.1 When considering the suitability of sites for burial use, other policy requirements relating to the alternative use of land also need to be assessed. This includes other policy areas of the NPPF (2023), The London Plan 2021, the Local Plan 2018-2033 and the Submission Draft Local Plan.
- 2.5.2 It is worth highlighting that since the election on 4<sup>th</sup> July, it is likely that in 2025 there will be changes to the NPPF.



## **NPPF 2023**

- 2.5.3 **Chapter 5** of the NPPF considers **‘Delivering a sufficient supply of homes’**. This requires a sufficient amount and variety of land to come forward where it is needed. Local Planning policy allocates sites for housing within the Borough, and these housing allocations have been considered when reviewing potential suitable sites.
- 2.5.4 **Chapter 8** of the NPPF considers **‘Promoting healthy and safe communities’**. Paragraphs 102-107 within the NPPF (2023) are particularly relevant, as these relate to ‘Open space’, of which cemeteries are included within the definition. Paragraph 102 states that ‘Access to a network of high-quality open spaces...is important for the health and well-being of communities’. It stresses that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision. Information gained from assessments should be used to determine what open space, sport and recreational provision is needed, and any proposed new cemeteries should seek to work with these assessments and not prejudice the ability to meet the identified needs,
- 2.5.5 Cemeteries and other burial grounds often function as green spaces within urban and rural areas. They can provide ecological benefits, such as supporting biodiversity, acting as carbon sinks, and contributing to the urban green network. Additionally, they offer recreational opportunities for walking and quiet reflection. However, they cannot deliver the full range of sport and recreational facilities.
- 2.5.6 **Chapter 9** of the NPPF relates to **‘Promoting sustainable transport’**. This supports the use of existing or proposed transport infrastructure, and seeks to pursue ‘opportunities to promote walking, cycling and public transport’.
- 2.5.7 When considering the intensification or extension of existing and any potential new sites within this study, accessibility, including access via sustainable means of transport has been considered. The need to travel via private car and the location of public transport networks in relation to sites has been considered.
- 2.5.8 **Chapter 11** of the NPPF relates to **‘Making effective use of land’**. Paragraph 123 requires planning to ‘promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions’. The framework highlights the importance of encouraging multiple benefits from land and recognising that land can perform many functions.
- 2.5.9 **Chapter 14** of the NPPF is **‘Meeting the challenge of climate change, flooding and coastal change’**. The Environment Agency<sup>8</sup> provides guidance on managing cemeteries and burials to prevent groundwater pollution and set out in more detail in the section on environmental constraints and in Appendix 2 of this study. This study has also produced a template that can

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<sup>8</sup> [Protecting groundwater from human burials - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/protecting-groundwater-from-human-burials)

be used in the future when considering extensions to existing cemeteries and potential new sites, Appendix 4. This sets out site criterion which should be assessed for each site.

2.5.10 **Chapter 15** of the NPPF relates to '**Conserving and enhancing the natural environment**'. The NPPF requires planning policies to protect and enhance 'valued landscapes, sites of biodiversity or geological value and soils'.

2.5.11 **Chapter 16** of the NPPF relates to '**Conserving and enhancing the historic environment**'. This requires a 'positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats'.

## 2.6 London Planning Policy

### The London Plan (2021)

2.6.1 **Policy H1** looks at housing supply and increasing it and in doing so the Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The ten-year housing targets for each London Borough are based on the 2017 London SHLAA. The figure for Newham is 32,800 dwellings, the second highest in London.

2.6.2 The London Plan requires boroughs to meet their targets. To do so, LBN has allocated housing sites in the emerging local plan. This will have an effect that any vacant or underused land identified through the SHLAA process has been or will be allocated for housing or mixed developments, removing the opportunity for other uses, such as new cemeteries.

2.6.3 Similarly, **Policy E4 and Policy E5** look at providing a sufficient supply of land and premises to meet the current and future demands for industrial and related functions across London. Due to the loss of 1,300 hectares of industrial land between 2001 and 2015 to other uses, the plan aims to provide sufficient employment land across London. This includes **Strategic Industrial Locations (SIL)** and this includes the **Lee Valley, London Industrial Park, Thameside East and West, and Beckton Riverside** in Newham

2.6.4 **Policy E6** provides guidance on **Locally Significant Industrial Sites (LSIS)** and again are to be protected although this may include appropriate land swaps.

2.6.5 **Policy HC1 on Heritage Conservation and Growth** and **Policy HC3** are important to consider. **HC1** highlights that Registered Parks and Gardens need to be protected and managed sensitively and many heritage assets make a significant contribution to local character which should be sustained and enhanced.

2.6.6 It also highlights that archaeology is significant across London and degrees of archaeological significance need to be addressed in plan through the identification of Archaeological Priority Areas (APAs).

- 2.6.7 **Chapter 8 on Green Infrastructure and Natural Environment** is extremely important in the context of this study. A green infrastructure approach recognises that the network of green and blue spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in an integrated way. **Policy G1** sets out the strategic green infrastructure approach and provides a framework for how this can be assessed and planned for.
- 2.6.8 **Policy G2** highlights London's Green Belt. As mentioned previously cemeteries are a use that can be developed with Green Belt. This is also true of Metropolitan Open Land (MOL) which is set out in **Policy G3** and **Policy G4** covers **Open Space** separately. Open spaces, particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London's infrastructure. All types of open space, regardless of their function, are valuable in their ability to connect Londoners to open spaces at the neighbourhood level.
- 2.6.9 Open space also provides locations to protect and enhance biodiversity and nature. **Policy G5** sets out how important Sites of Importance for Nature Conservation (SINCs) are and includes cemeteries.
- 2.6.10 **Policy SI12 on Flood Risk Management** is also important when considering the intensification and extension of existing cemeteries and the development of potential new site. **Policy SI 13 Sustainable Drainage** is also a key consideration in managing surface water and run-off and the implication for burials.
- 2.6.11 Transport policies need to be considered in terms of access within the Borough and across border flows and the potential for the wider region to play a role in future burial needs. This includes **Policies T1 Strategic Approach to Transport, Policy T3 Transport Capacity**.
- 2.6.12 All of the above policies within the London Plan have a bearing on the development of the adopted and emerging Local Plans for Newham and on this assessment.

## 2.7 Local Planning Policy

### **Newham Local Plan (2018 – 2033, adopted 2018)**

- 2.7.1 The need to locate burial space in places which are accessible to the population, and which benefit from existing infrastructure, would indicate that, where possible, provision of potential new burial space should be located within strategic growth areas identified by the Council in its local plans. Given the competition for land in the local urban context, it is likely that if such provision is possible in these areas, cemeteries will need to perform multiple functions beyond places of interment, as green spaces and places which can support biodiversity enhancement.

- 2.7.2 Other policies include, **Policy SP5 ‘Heritage and other Successful Place-making Assets’** states *‘The value of heritage and other assets (natural, cultural, architectural, and infrastructural) which contribute to local character and successful places will be recognised by protection, conservation, and enhancement of the assets and their settings’*.
- 2.7.3 When reviewing sites for new cemeteries, as with all development, due consideration is needed of the potential for impacts on designated and undesignated heritage assets.
- 2.7.4 **Policies J1 to J3** relates to Jobs, Business and Skills. **Policy J1 ‘Business and Jobs Growth’** and **J2 ‘Providing for Efficient Use of Employment Land’** focuses employment development to certain areas. Economic Development is a key aspect of the Local Plan and the Plan seeks to protect and enhance the employment sites within LBN. It would therefore be generally unsuitable to locate new cemeteries within these designations.
- 2.7.5 Overall, the policies relating to housing demonstrate that a significant amount of residential development is required with the Borough as set out above by the London Plan 2021. **Policy H1 ‘Building Sustainable Mixed Communities’**, identifies a ‘net increase of additional quality homes exceeding 43,000 between 2018 and 2033 and that ‘The majority of housing delivery will take place as part of large-scale mixed-use development on strategic sites’. As outlined in paragraph 2.6.2, boroughs are required to meet these housing targets so any sites allocated for housing, and which therefore contribute towards meeting these targets, cannot be used for any other purpose.
- 2.7.6 According to **Policy SC1 ‘Environmental Resilience’**, *‘a. In design, construction, and operation, development must respond to the known effects of climate change, including the likelihood of extreme weather events, geohazard risks, increased water scarcity and warmer temperatures; b. Development must be resource-efficient’* and *‘avoid and minimise harm to the environment’*.
- 2.7.7 **Policy SC3 ‘Flood Risk and Drainage’** seeks to ensure that flood risk is considered and reduced through new developments. The policy states that *‘There is a presumption against impermeable hard-standing on domestic gardens and public open space’*. Flood risk is particularly relevant since whilst approximately 15% of the Greater London Area is at high risk of flooding, this risk is *‘over 50% in Newham where the rivers Thames, Roding, and Lea comprise the southern, western, and eastern boundaries of the Borough’*.
- 2.7.8 This policy is particularly relevant when exploring intensification, extensions and potential new burial sites. As mentioned previously the Environment Agency provides guidance on managing cemeteries and burials to prevent groundwater pollution. This is set out in more detail in the environmental constraints section and Appendix 2.
- 2.7.9 When reviewing sites, flood risk has been considered to avoid recommending sites in inappropriate locations in terms of flood risk. Any potential new sites should be assessed against the environmental site criteria including ground water and source protection zones.

- 2.7.10 **Policy INF2 ‘Sustainable Transport’** aims to secure *‘a more sustainable pattern of movement in Newham’*. In making provision for new cemetery space, a key consideration will be to ensure that this is located in areas with good access by a range of transport modes as it is expected that cemeteries will generate new footfall.
- 2.7.11 **Policy INF6 ‘Green Infrastructure and the Blue Ribbon Network’** states *‘Green infrastructure and the Blue Ribbon Network will be protected and enhanced’*. Also, *‘The multiple roles and benefits of designated and undesignated Green Infrastructure will be maximised’*. There are sites present in the Borough which have been designated as ‘Protected Green Space’, for example the City of London Cemetery & Crematorium (Site GS3). This is therefore important in the considerations of this report as all burial facilities in Newham are classified as open space.
- 2.7.12 **Policy INF7 ‘Open Space and Outdoor Recreation’** states *‘Existing open spaces (including riverside access, allotments and burial space) and outdoor recreation facilities will be protected’*. Overall, the development of new cemeteries in the Borough will have to be consistent with these policies, ensuring protection and enhancement of green infrastructure and ensuring that there is still a sufficient amount of recreational open space.
- 2.7.13 **Policy INF8 ‘Community Facilities’** at Section 6.101 identifies burial spaces as community facilities. Additionally, Town and Local Centre for the development of community facilities will be prioritised. The Local Plan has identified Community Facilities Opportunity Areas (Table 14 of the Local Plan) and Community Facility Site Allocations (Table 15). As evidenced in Table 15, each site has been allocated with a primary community need and five sites have been recognised as ‘Community Centre / flexible community use’.

### **Draft Submission Newham Local Plan (2023-2038)**

- 2.7.14 There will be other important policies within the emerging Local Plan for green spaces, recreation and other open space, other community facilities and the draft policies and allocations for meeting housing and employment needs, which are set out below that will need to be addressed when considering the suitability of sites for burial use, other policy requirements relating to the alternative use of land also need to be assessed.
- 2.7.15 The key draft policies the need to be considered are:
- **BFN1: Spatial strategy**
  - **D8: Archaeological Priority Areas**
  - **D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens**
  - **HS1: Newham’s Town Centres Network**
  - **H1: Meeting housing needs**
  - **J1: Employment and growth**
  - **GWS1: Green spaces**

- **CE7: Managing flood risk**
- **T1: Strategic transport**
- **T2: Local transport**
- **T3: Transport behaviour change**

2.7.16 **Draft Policy BFN1: Spatial strategy** identifies where development and change will occur across the borough to deliver the Plan's vision and objectives. Newham is home to three Opportunity Areas designated in the London Plan (2021) as key locations with potential for new homes, jobs and infrastructure of all types. However, growth and development will also occur in other neighbourhoods, where land is available for development and/or intensification and where the Characterisation Study (2024) has identified it as being suitable for growth and change. Growth in these neighbourhoods will provide locations for homes and employment as well as providing much needed social infrastructure. Although cemeteries are recognised as social infrastructure, the space requirements result in different spatial requirements and challenges.

2.7.17 **Policy D8: Archaeological Priority Areas** recognises that local authorities have a responsibility to conserve the historic environment, including through policies to identify areas where development must have due regard to processes for identifying, recording and preserving potentially significant archaeological remains.

2.7.18 **Policy D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens** also recognises the importance of protecting, conserving and enhancing other designated heritage assets. This includes those buildings, monuments, structures, parks, etc., that are subject to national listing or scheduling.

2.7.19 This policy recognises that all these types of heritage assets, including some of Newham's cemeteries, are sensitive to change that may directly or indirectly affect them.

2.7.20 **HS1: Newham's Town Centres Network.** Overall, the main objective of this policy is to deliver a network of vibrant town centres, local centres and neighbourhood parades within a network of well-connected neighbourhoods. To help achieve this objective, the Network's proximity and density criteria, the 400 metre radius have informed the designation process. A number of existing and recently delivered high street locations have been designated through this Local Plan.

2.7.21 **H1: Meeting housing needs.** The London Plan has identified that Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider housing need.

2.7.22 As a result, the draft Local Plan is seeking to enable the delivery of between 51,425 and 53,784 additional new homes. This range target is capacity-derived, based on:

- approved planning permission;
- design-led capacity testing of site allocations;

- capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment; and
- capacity assumptions from lapsed application sites.

2.7.23 To meet the borough's housing target, developments will need to optimise the delivery of homes on site allocations, small sites and other large windfall sites using the design-led approach set out in both local and regional policy. As such these sites are not considered suitable for other uses.

2.7.24 Applicants will need to ensure that housing has access to adequate supporting infrastructure, such as public transport, healthcare, education and utilities, as well as local facilities such as retail, social infrastructure, open spaces and parks.

2.7.25 **Policy J1: Employment and growth.** The council is required to plan positively to ensure a sufficient supply of land in the right places to support economic growth. Jobs in Newham are expected to grow within the Local Plan period. This policy sets out the approach to enabling, growing and diversifying Newham's economy through safeguarding and promoting high quality employment locations to support investment and job creation.

2.7.26 This policy is evidenced by the employment need figure and market view. Newham is attractive to a range of sectors. It sets out Newham's approach to enabling growth within current and emerging sectors by distributing appropriate types, scales and designs of employment floorspace across the borough. The policy directs sectors to suitable locations based on evidence, including the Employment Land Review (2022). As such these sites are not considered suitable for other uses.

2.7.27 **Policy GWS1: Green spaces.** Newham's green spaces offer opportunities for social interaction and, in a densely populated borough, give a valued link to nature and a place of quiet retreat as well as a place of learning. There are also economic benefits, with beautiful green and water spaces encouraging people to spend time and money in a place and helping to generate and sustain green economy jobs.

2.7.28 These green spaces are highly treasured by residents in the borough, and parts of the borough appear to be very green, however the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs.

2.7.29 If publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038.

2.7.30 For Newham to enjoy the same, or greater, level and quality of provision over the Plan period, the Council will need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard will require the creation of 66 hectares of additional publicly accessible green space to sustain provision at the 2023 standard.

- 2.7.31 Of equal importance over the Plan period will be the protection of the existing spaces including allotments, parks and gardens, playing fields & sports facilities, green corridors and semi natural urban greenspaces. Such areas play a vital role in building healthy neighbourhoods, contributing to physical, mental and emotional wellbeing. Without access to these spaces, the quality of life and wellbeing of our residents is reduced. This will have a direct effect on any future potential cemetery sites.
- 2.7.32 In particular, the borough has identified playing pitch deficits for football, cricket, rugby union and tennis. Newham's Playing Pitch Strategy (2024) has established that the existing shortfalls identified can be met by better utilising current provision.
- 2.7.33 **Policy CE7: Managing flood risk.** As with most local authorities, Newham has declared a climate emergency, which requires urgent action to be taken to counter the impacts of climate change. London is experiencing and will continue to experience more intense rainfall episodes for longer periods of time and sea level rise with potential for increased storm surges, including within the tidal Thames. Newham's watercourses are at the Thames, Roding and Lea Rivers with some major growth areas falling within Zones 2 and 3.
- 2.7.34 Flood risk, both the likelihood and severity of occurrences, is therefore likely to increase from a range of sources: tidal, fluvial (rivers), rain (surface water), groundwater, sewer overflow and reservoir failure. As such, it is vital that development minimises flood risk, and reduces the risk to people and essential infrastructure.
- 2.7.35 The intensification, extension and potential identification of new burial sites in Newham is highly sensitive to flood risk and it is a key consideration for this study.
- 2.7.36 **Policy T1: Strategic transport, Policy T2: Local transport and Policy T3: Transport behaviour change.** Policy T1 considers strategic transport infrastructure delivered by infrastructure providers, and how developers can support (and not hinder) the delivery of this strategic transport infrastructure. Policy T2 considers infrastructure that developers could deliver and link onto their site, part of a wider transport network. Policy T3 considers how development can deliver behaviour change through onsite measures

### Summary

- 2.7.37 The policy summaries provided above highlight the challenges when considering the availability of land for burial space. These include the national and regional requirements to meet housing and employment targets and the requirement to deliver sufficient space for statutory or council or state provided social infrastructure, such as schools, nurseries, libraries and health facilities. In addition, the borough's parks, playing fields and growing space are under increasing pressure to be multi-functional spaces which can support a significant increase in use.
- 2.7.38 The policies also highlight spatial opportunities, namely the use of green belt and Metropolitan Open Land where sensitive burial space is one of the few land uses allowed.



2.7.39 The policy challenges and opportunities, alongside the environmental considerations, will be used to identify the location of any suitable sites, which could then come forward and would be subject to the requirements set out in Policy SI5 in the new Local Plan.

## 2.8 Regional Requirements

2.8.1 The duty to co-operate was created in the Localism Act 2011, and places a legal duty on LPAs, County Councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

2.8.2 Although the Draft Local Plan is for Newham, the burial needs assessment must establish adjoining authority's interment capacity and the spatial patterns of interments across Council lines. To do this, this study reviews whether adjoining authorities have undertaken burial needs assessments or have considered burial needs as part of their local plan.

2.8.3 The neighbouring councils considered include Tower Hamlets, Hackney, Waltham Forest, Redbridge, Barking & Dagenham and Havering. The section below identifies surrounding authorities' burial capacities.

### Tower Hamlets

2.8.4 Tower Hamlets does not have any operational burial facilities within the borough. This is in accordance with the Audit of London Burial Provision (2011), in which it is stated that Tower Hamlets have 'no provision'.

2.8.5 According to the Tower Hamlets Council, the residents of the borough have the opportunity to use Kemnal Park cemetery, where the council have several burial spaces available and option for additional plots if needed<sup>9</sup>. Although, LBN has been advised by the Muslim Burial Association that this provision is now full. Need will need to be verified.

2.8.6 The Tower Hamlets Disclosure Log FOI: 52507801 states '*Plots outstanding to be used as at 26 June 2024 = 407 plots (all of which are double depth)*'<sup>10</sup>.

2.8.7 Upon desktop search, it appears that Tower Hamlets have not undertaken a burial study. Burial space is not addressed within any of the policies of the Tower Hamlets Local Plan 2031 (Adopted January 2020) either.

### Hackney

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[https://www.towerhamlets.gov.uk/FAQs/COVID\\_19\\_related\\_death\\_info\\_and\\_support/How\\_much\\_capacity\\_is\\_there\\_in\\_existing\\_cemeteries.aspx](https://www.towerhamlets.gov.uk/FAQs/COVID_19_related_death_info_and_support/How_much_capacity_is_there_in_existing_cemeteries.aspx)

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<https://towerhamletsportal.icasework.com/resource?id=D47555001&db=LKIVPdkPTgixWsHCc7ICNQ%3D%3D>

- 2.8.8 According to the Audit of London Burial Provision, Hackney's capacity is 'full'. Although at this stage, Hackney Council have not undertaken a burial study. Burial space is not addressed within any of the policies of the Hackney Local Plan 2033 (Adopted July 2020) either.

### **Waltham Forest**

- 2.8.9 According to the Audit of London Burial Provision, Waltham Forest has a capacity of 5,200. However, this study was commissioned in 2011 and current capacity is unknown. According to the audit, the boroughs capacity status is 'critical' with a reliance on created graves and burial space likely to be exhausted. However, there is an existing cemetery extension at Folly Lane, London E4 8ER, which was granted permission for change of use to a cemetery in July 2023.
- 2.8.10 This extension is for a Muslim faith burial ground cover 0.7 ha which could potentially provide 1,383 plots.
- 2.8.11 The London Borough of Waltham Forest have not undertaken a recent burial study. Within the of Waltham Forest Local Plan Part 1 (Adopted 2024), 10 sites have been identified as 'Cemeteries, disused Churchyards & other Burial Grounds' covering a total area of 36.5 ha. However, burial space is not addressed within any of the policies.

### **Redbridge**

- 2.8.12 The Audit of London Burial Provision establishes that Redbridge has a capacity of 13,800. According to the London Borough of Redbridge, there are five cemeteries, four closed churchyards (no space for further burials) and a crematorium.
- 2.8.13 Forest Park Cemetery and Crematorium, which is the main cemetery within the borough, has capacity for burials although the exact capacity is not stated. Barkingside Garden of Rest, Longwood Gardens, Barkingside and Barkingside Cemetery, Longwood Gardens, Barkingside both holds no new burial space but is open for burials in pre-purchased plots. Roding Lane North Cemetery, Woodford has a dedicated burial area for the Ahmadiyya Muslim community. Buckingham Road Cemetery holds no new burial space. London Borough of Redbridge have not undertaken a burial study.
- 2.8.14 Burial space is addressed within the Redbridge Local Plan 2015-2030 (Adopted 2018). Policy LP40 Burial Space aims to '*protect existing and support additional land to be used for burial space*'. The policy also states that '*the council will work with the religious community to inform future burial provision*'. The Local Plan states that '*existing burial reserves in the borough are expected to last until 2030/31*' and '*though capacity in an overall sense is adequate, the Council will support additional burial space to cater for the requirements of different religious groups within the borough where a local need is identified*'.

## **Barking & Dagenham**

- 2.8.15 The Audit of London Burial Provision does not provide a capacity figure for Barking & Dagenham. According to the London Borough of Barking & Dagenham, there are three cemeteries within the borough, and all have available grave space. To date, Barking & Dagenham have not undertaken a burial study.
- 2.8.16 Barking & Dagenham are in the process of preparing a new Local Plan 2019 -2034 and this identifies burial space as one of the facilities covered by social infrastructure and community facilities. Draft Strategic Policy SP8: Delivering social infrastructure in the right locations states the council will support social infrastructure development.
- 2.8.17 Section 8.4 Cemeteries of the Barking & Dagenham Infrastructure Delivery Plan (2020) concerns cemeteries. Section 8.4.3 states that there is a shortage of burial space within the borough and that Rippleside cemetery is the only cemetery with provisions for those of Muslim faith. The plan document also states that *'burial capacity within the neighbouring borough of Redbridge may provide opportunities to address Barking and Dagenham's undersupply of burial spaces'*.

## **Greenwich**

- 2.8.18 The Audit of London Burial Provision identifies that Greenwich has adequate capacity of more than 7,480. However, this study was commissioned in 2011 and current capacity is unknown as currently the London Borough of Greenwich have not undertaken a burial study.
- 2.8.19 According to the Royal Borough of Greenwich, the borough has five cemeteries although burial space is not addressed within any of the policies of the Royal Greenwich Local Plan (2014).

## **Havering**

- 2.8.20 The Audit of London Burial Provision indicates that Havering had critical capacity. The London Borough of Havering care for four cemeteries.
- 2.8.21 There are new graves available in Upminster and Romford. Burials can take place in existing family graves in all their cemeteries. Upminster appears to be able to cater to more types of graves, and Hornchurch the least.
- 2.8.22 In addition, a proposal at Harold Wood Muslim Cemetery Oak Farm, Maylands Fields, Harold Wood granted permission on Appeal in 2017, has now being constructed and is due to open in late 2024. This is providing 10,000 plots and will serve as a sub-regional facility.
- 2.8.23 Another Muslim burial site is the Maylands Gardens of Peace in Romford. This is due to open late 2024 with consent for 10,000 burial plots.

2.8.24 Policy 16 Social infrastructure of the Havering Local Plan 2016-2031 states that ‘the Council will protect existing burial space provision as designated on the Policies Map to meet the need for burial space over the Plan period’. Paragraph 8.5.8 states ‘The future demand for burial space in the borough has been identified through the Council's Infrastructure Delivery Plan. Sufficient supply of multi-faith/interdenominational plots has been identified for the full Local Plan period’. The borough had identified sufficient capacity for meeting specific Muslim requirements until around 2024.

2.8.25 At the present time, the London Borough of Havering have not undertaken a burial study.

### **Burial Facilities outside Greater London**

2.8.26 Sewardstone Park Cemetery is a privately owned cemetery located in Epping Forest, Essex, and approximately 11 miles from central London. It currently covers 28 ha, but the land adjacent could provide some 50 ha for future expansion. The 28 ha will provide 55,328 burial plots.

2.8.27 At present, the cemetery includes:

- Daws Meadow: This area provides burial and cremation options for all faiths and secular preferences.
- Garden of Firdaus: Dedicated solely to individuals who follow the Islamic faith.

## **2.9 Environmental Requirements**

2.9.1 There are several environmental constraints which must be considered when assessing the suitability of land for burials. These are outlined in this section and a more detailed assessment of these constraints should be undertaken in any future phase 2 work, should a site be promoted as a burial site. A matrix template has been developed to aid this process. This is available in appendix 2.

2.9.2 The following constraints were considered through this initial phase 1 desktop research:

- **Ecology** - Ecology is an important consideration. Creation of a cemetery could adversely affect ecology present. Sites of very high ecological value may not be appropriate for a cemetery development, if the impacts of a cemetery would result in significant, adverse ecological impacts. A preliminary ecological assessment could be undertaken to assess the level of ecological value associated with a site. Any future phase 2 assessment would need to identify ecology present and determine whether this would rule out cemetery use, or whether a mitigation strategy would be possible e.g. relocation, timing of development etc.
- **Hydrology/Hydrogeology** - Groundwater conditions require specific consideration in respect of burial grounds and crematorium projects. Protecting groundwater from human burials

guidance<sup>11</sup> provides more detail, in that to meet minimal good practice groundwater protection measures, a burial site must be assessed against the Environment Agency Measures (Appendix 2):

**Measure 1:**

- Outside a groundwater source protection zone 1 (SPZ1);
- Not located within 10 metres of the nearest field drain;
- Not located within 30 metres from the nearest spring or watercourse;
- Not located within 250 metres of any well, spring or borehole where the water is intended for human consumption or used in food production; and
- Not located in areas identified as having karstic groundwater flow characteristics – these areas are highly vulnerable to pollution because groundwater can flow quickly through the many fissures and fractures in the rocks.

**Measure 2:**

- Not located on land liable to flooding. NB the guidance does not specify how flood risk should be identified however land in flood zones 2 and 3 and vulnerable to surface water flooding are all considered to be liable to flooding and are therefore unlikely to be suitable for burial space.

**Measure 3:**

- The base of each grave must be at least 1 metre above the highest anticipated annual groundwater level.

**Measure 4:**

- The graves should not be dug in unaltered or unweathered bedrock.
  - All cemetery developments and burials must maintain an unsaturated zone below the base of the grave(s).
- **Landscape** - Any potential burial facility development should always seek to retain existing trees and hedgerows so the proposed development can successfully assimilate with its surroundings. Care should also be given when creating new accesses into the site as this can have a negative impact on the local landscape. The matrix can be used to quickly assess sites for landscape sensitivity once a site has been identified or being promoted.
- **Highways** - Vehicle movements associated with burial and crematorium are relatively modest. It is estimated that a funeral will generate circa 20 vehicles arriving/departing per funeral with

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<sup>11</sup> <https://www.gov.uk/government/publications/protecting-groundwater-from-human-burials/protecting-groundwater-from-human-burials>

between 7 to 8 funerals per day Monday to Friday plus 2 to 3 on a Saturday morning. (Appendix 4). Newham does not have prescribed standards for the provision of car parking spaces at cemeteries or crematoriums. However, sufficient Car Parking needs to be provided onsite and if possible, a non-car travel option should be provided

- 2.9.3 Contaminated land will also need to be considered when identifying new cemeteries. A Preliminary Risk Assessment and potentially further ground investigation studies will need to be carried out during a later detailed phase and an Environmental Permit may also be required. Newham council confirmed that there are no relevant sites to this study designated as contaminated land under Part IIa of the Environmental Protection Act in Newham.

## 3.0 Projected Needs for Burials Amongst Newham Residents from Different Communities for the period 2023-2038

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### 3.1 Introduction

3.1.1 This chapter has assessed the historic population trends and future population forecasts, mortality within the Borough and an assessment of the different faith groups. To understand the projected need for burials amongst Newham residents, a baseline of existing burial plots within Newham's burial sites, provided by Newham Council, has been utilised. This has provided an estimated calculation of the surplus or deficit of burial spaces for each religion within the Borough for the period 2023-2038.

### 3.2 GLA Audit of London Burial Provision (2011)

3.2.1 Although the GLA Audit of London Burial Provision (2011) is not policy itself, it does guide and steer policy as the Mayor of London SPG on social infrastructure (see above chapter) contains a chapter on burial needs. The SPG states that *'In implementing the adopted Plan and especially Policy 7.23, the Mayor will, and boroughs and other partners are advised to consider the needs and capacity assessment for burial space set out in figures in figures 18 to 22'* (findings from the GLA, Audit of London Burial Provision 2011). A table summarising borough capacity status can be found in Table 1.

3.2.2 Figure 18 from the SPG (2015), illustrates the burial capacity status of London boroughs (see Table 1). This is based on the then 2010 GLA demographic projections and existing provision up to 2031, allowing for the variation in burial rate by faith. The map shows Newham Borough is classified as 'Sustainable'– capacity status in Figure1.

3.2.3 Figure 2 shows how different faith groups have varying preferences for whether they choose to be buried, (Source: GLA Audit, 2011). Muslim and Jewish faith groups have the highest percentage of people requiring burial, at 99% and 96% respectively.

**Table 1: Capacity of London Boroughs (Source: GLA, Audit of London Burial Provision 2011)**

Borough area	Total cemetery space (ha)	Interments 2009	Estimated virgin grave spaces required, 2010-11 - 2030-1	Capacity	Capacity status
<i>Barking &amp; Dagenham</i>	22.0	na	7,851	na	2
<i>Barnet</i>	135.9	865+	17,553	60+years	4
<i>Bexley</i>	21.0	300	8,913	4,080	3
<i>Brent</i>	17.3	203	11,538	Reclaiming	2
<i>Bromley</i>	32.3	103+	12,441	9,080+	3
<i>Camden</i>	30.0	111e	9,244	FULL	1
<i>City of London</i>			309	NO PROVISION	1
<i>Croydon</i>	25.0	300e	14,172	Reclaiming	2
<i>Ealing</i>	51.8	549+	12,943	3,200	3
<i>Enfield</i>	40.0	na	13,540	na	3
<i>Greenwich</i>	61.0	471	11,162	7,480+	4
<i>Hackney</i>	13.4	6	9,789	FULL	1
<i>Hammersmith &amp; Fulham</i>	51.5	267	5,493	5,340	2
<i>Haringey</i>	24.3	na	8,961	2 years	2
<i>Harrow</i>	19.4	158	9,023	200+	2
<i>Havering</i>	17.0	419	9,934	na	2
<i>Hillingdon</i>	70.0	359	9,541	18,250	4
<i>Hounslow</i>	36.9	433e	8,587	20,418	4
<i>Islington</i>				NO PROVISION	1
<i>Kensington &amp; Chelsea</i>	16.2	na	5,271	FULL	1
<i>Kingston upon Thames</i>	16.1	105	5,816	1,966+	3
<i>Lambeth</i>	17.0	56	10,503	FULL	1
<i>Lewisham</i>	39.7	na	9,116	20+years	4
<i>Merton</i>	53.5	429+	7,260	20,996	4
<i>Newham</i>	120.7	777+	11,973	Re-using	5
<i>Redbridge</i>	18.7	205	12,805	13,800	4
<i>Richmond upon Thames</i>	73.3	879	6,116	26,600	4
<i>Southwark</i>	50.9	na	9,078	INSUFFICIENT INFORMATION	
<i>Sutton</i>	16.23	196+	7,721	30+years	4
<i>Tower Hamlets</i>	0	0		NO PROVISION	1
<i>Waltham Forest</i>	21.7	171	11,093	5,200	2
<i>Wandsworth</i>	77.5	372+	8,225	2-3years	2
<i>Westminster</i>	0	0	7,795	NO PROVISION	1
<b>Total</b>	<b>1,190.3</b>	<b>7,734+</b>	<b>293,766</b>	<b>136,610+</b>	





**Figure 1: Capacity Status of London boroughs**  
 (Source: GLA, Audit of London Burial Provision 2011)

Religion	% choosing burial
Muslim	99
Jewish	96
Buddhist	91
No religion	50
Christian	27
Sikh	16
Hindu	10
All Other Religions	68

GLA, Audit of London Burial Provision 2011

**Figure 2: Burial rate by religion (Source: GLA Audit, 2011)**

3.2.4 Figures 3 and 4 demonstrate those boroughs with large faith group populations that require burial, such as Muslim and Jewish faith groups, are going to require more burial spaces. Furthermore, according to the SPG, ‘*these faiths tend to seek one interment in each grave and would not favour any measure to re-use grave space or reclaim unused space in an existing grave*’. The SPG points out that this has implications for the land requirements to meet these burial needs and this must be considered in this study.

3.2.5 Figure 3 suggests that 45% of all estimated burials in Newham and London are projected to be Muslim burials due to the population structure, leading to increased requirement for this type of provision within Newham.



3.2.7 This study has built on the findings of the GLA Audit of London Burial Provision (2011) and 2021 Census data and used the same methodology but with updated population projections, ensuring that Newham burial needs assessment findings and recommendations are consistent with the London Plan 2021 (which is guided by the SPG 2015).

3.2.8 This assessment also looks in more detail at each existing cemeteries in Section 4.

### **3.3 Forecasted Mortality in Newham**

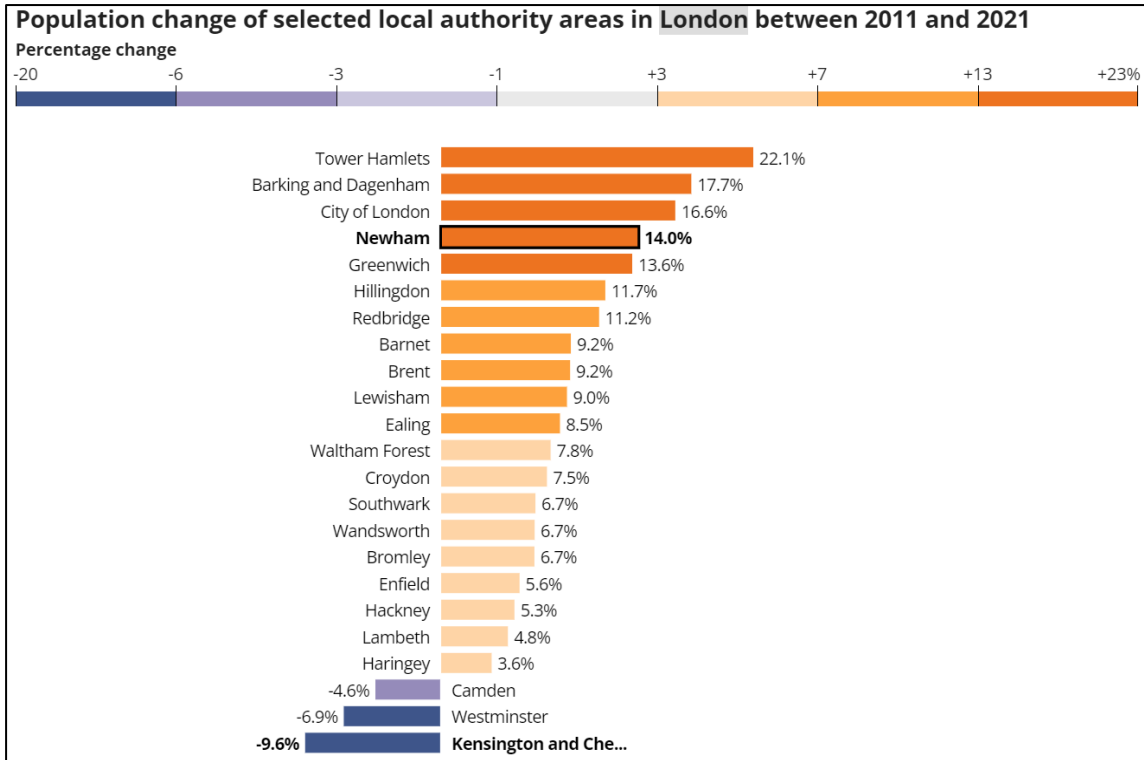
3.3.1 This section examines the population trends within the Borough, including historic population trends and future population forecasts. Information on mortality within the Borough is also provided, as well as the population of different faith groups.

3.3.2 Office for National Statistics (ONS) data projects the population until 2041, and therefore the data within this section extends beyond the adopted plan and the draft local plan period (2018 - 2038). This ensures all data is based on long term trends and will enable the Council to plan both within the current plan and the emerging plan periods.

### **3.4 Population in Newham**

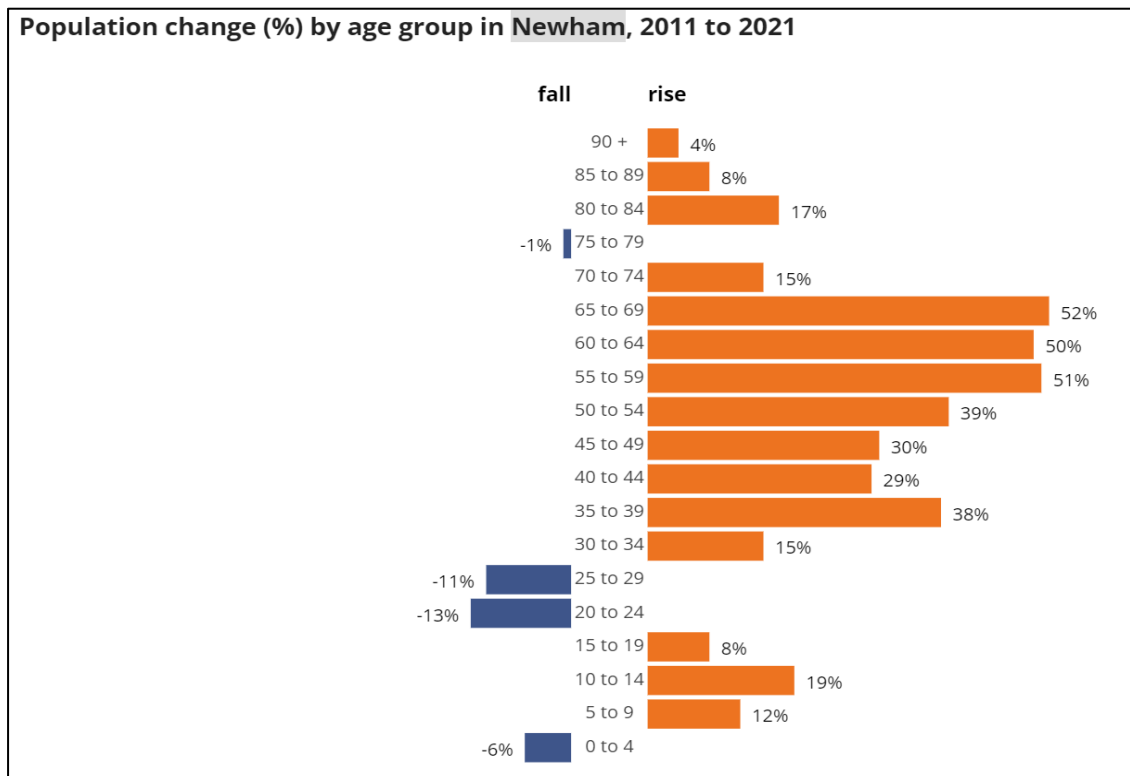
3.4.1 In Newham, the population size has increased by 14.0%, from around 308,000 in 2011 to 351,256 in 2021. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800. At 14.0%, Newham's population increase is higher than the increase for London (7.7%) (Figure 5).

3.4.2 The largest population increases in London have been seen in the adjoining Boroughs of Tower Hamlets and Barking and Dagenham, where the populations have grown by 22.1% and 17.7%, respectively. In 2021, Newham ranked 24th for total population out of 309 local authority areas in England, moving up 10 places in a decade. As of 2021, Newham is the eighth most densely populated of London's 33 local authority areas, with around 69 people living on each football pitch-sized area of land.



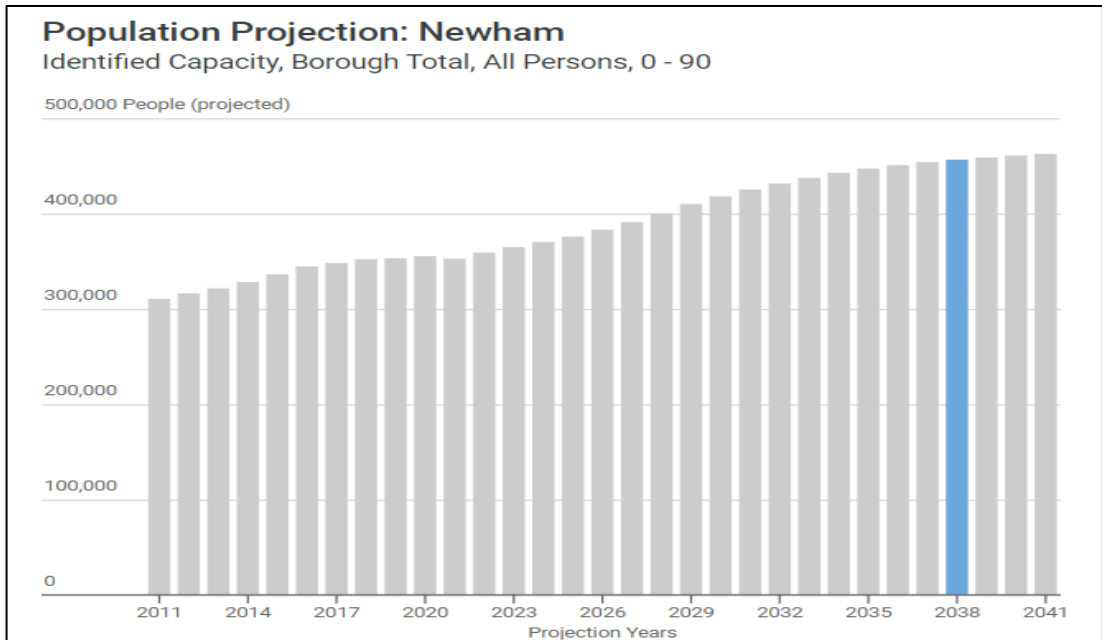
**Figure 5: Population change in Newham between 2011 and 2021 (Source: ONS 2021)**

3.4.3 In Newham, there has been an increase of 21.9% in people aged 65 years and over, an increase of 15.3% in people aged 15 to 64 years, and an increase of 7.1% in children aged under 15 years (Figure 6).

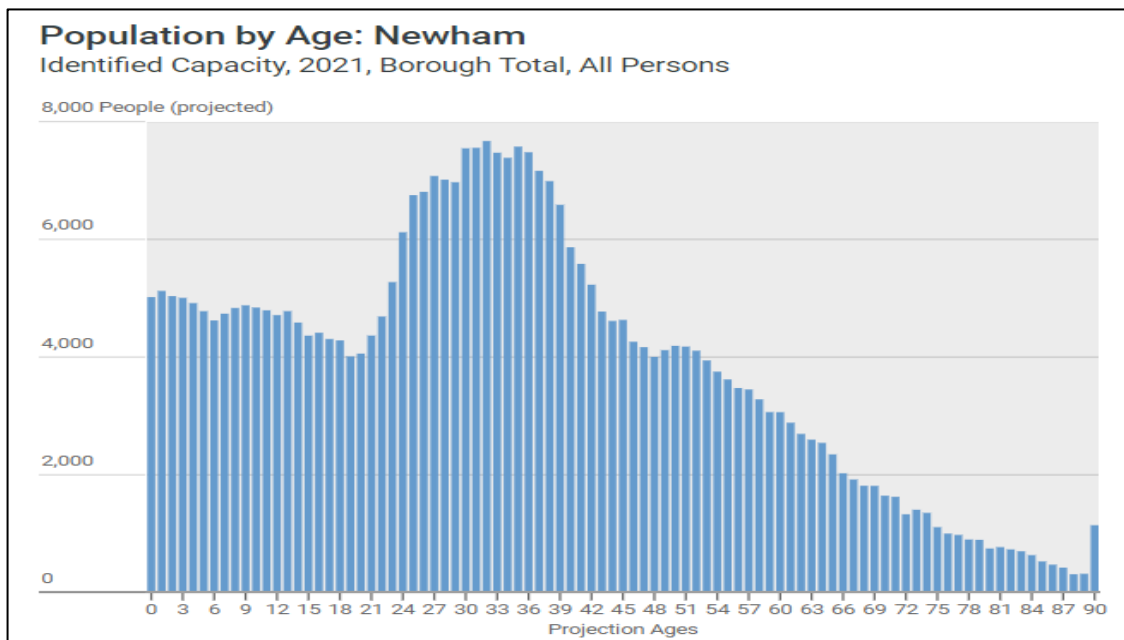


**Figure 6: Population change by age group in Newham 2011-2021 (Source: ONS)**

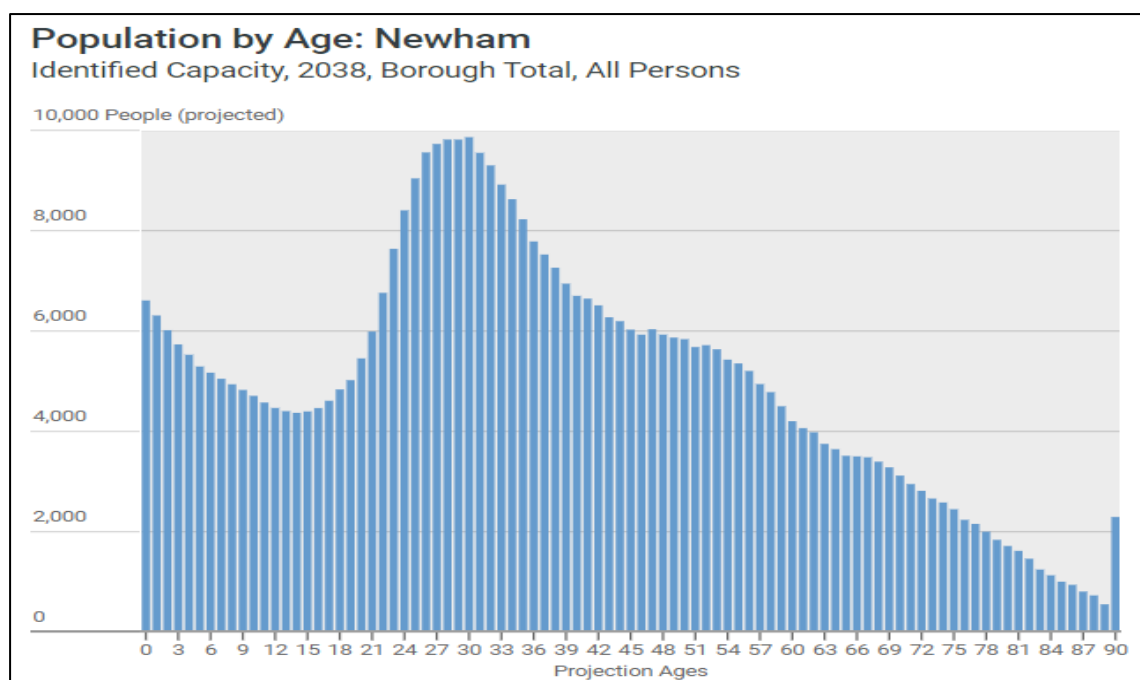
3.4.4 The total population in Newham is projected to increase by 19% from just under 308,000 in 2011, to 456,462 by the end of the proposed plan period (2038) and over 462,000 by 2041. The projected population is shown within figure 9 below and is based on the GLA 2020-based projections which are the most reliable official published projections. The 2021 Mid-Year Estimates (MYE), published by ONS in December 2022 and released by the GLA in January 2023, is the first to incorporate the results of the 2021 census. The 2021 MYE does not align with the current official estimates for 2012-2020 and this release is considered interim as some of the key data required to fully update the projections are not yet available.



**Figure 7: Population Projection for Newham**  
(Source: GLA Demography 2020-based Projections/GLA City Intelligence)



**Figure 8: Population by Age in Newham 2021**  
(Source: GLA Housing Led population projections)



**Figure 9: Projected Population by Age in Newham 2038**  
 (Source: GLA Housing Led population projections)

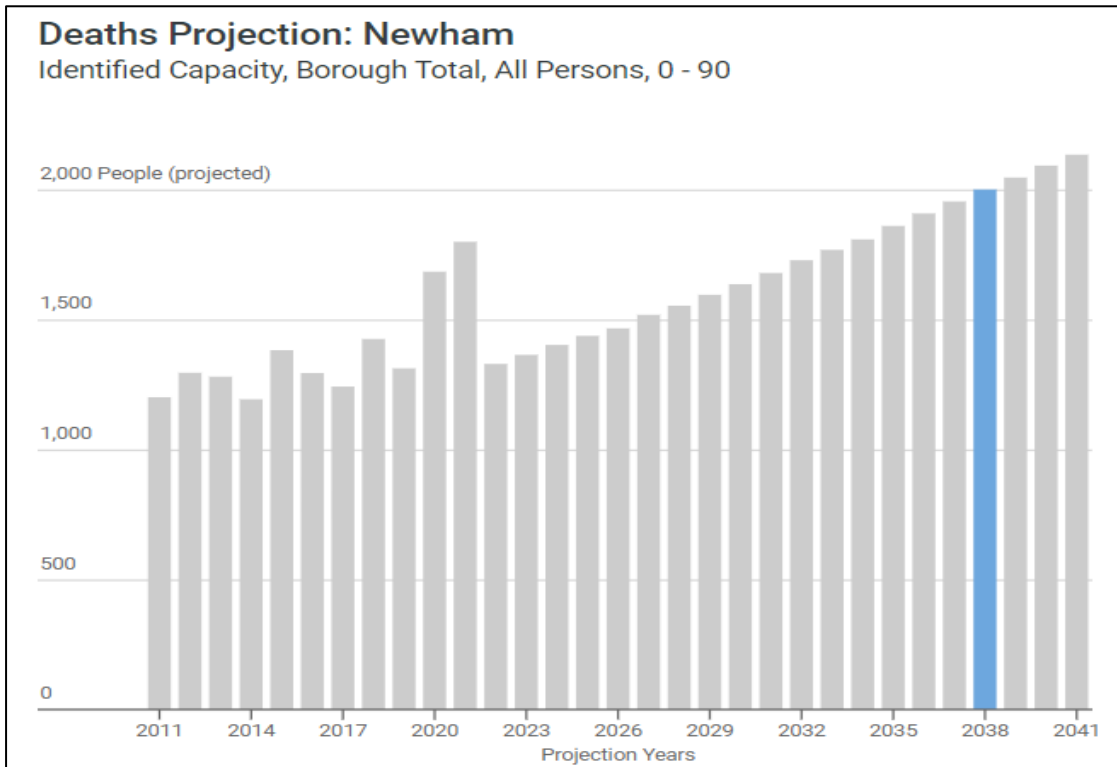
3.4.5 The size and structure of the population in Newham is largely made up of working-age adults. These patterns are similar for admin-based population estimates (ABPEs) and census-based mid-year estimates (MYEs). The ABPEs show that there were 349,900 people living in Newham in 2021. This increased by 3.0% to 360,400 in 2022. The population was 50.0% female and 50.0% male.

3.4.6 The highest proportional increases are forecast to be in residents aged 70 and over. This equates to over 6,000 more residents aged 70 and over. The smallest proportional increase is forecast to be the 10–19-year-olds.

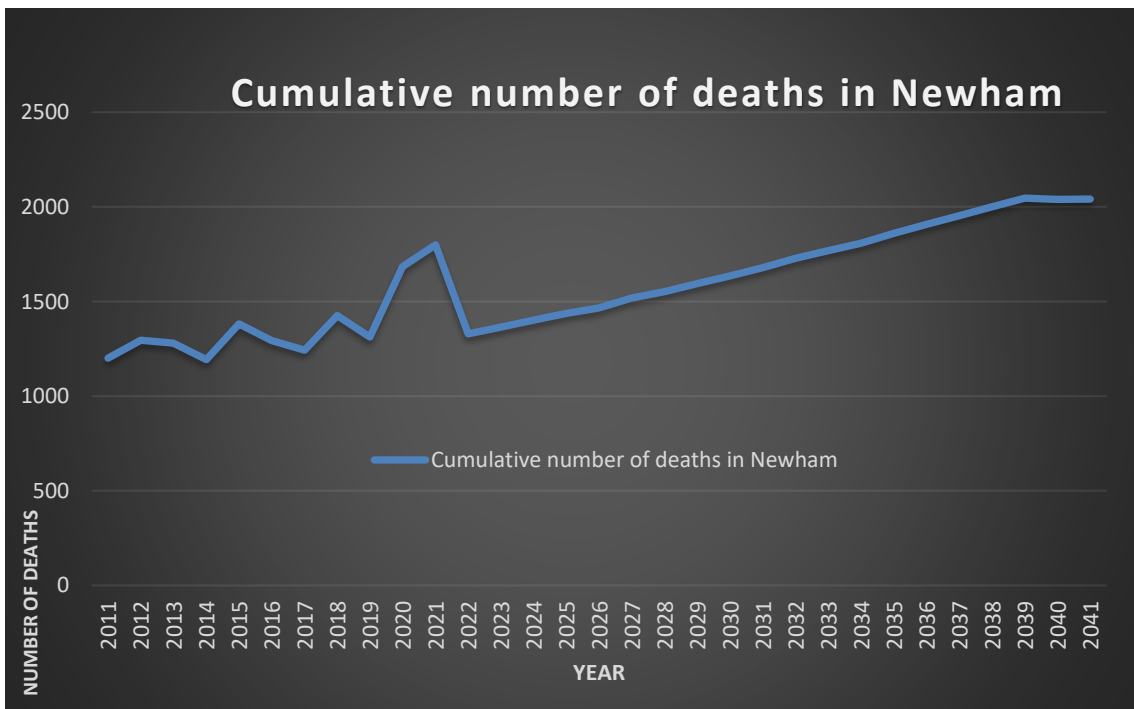
### 3.5 Mortality in the Borough

3.5.1 Mortality rate is forecast by the GLA Demography 2020-based population projections, and this can be applied to the population projections to establish the expected number of deaths. This assumes of a continuing 1.4% annual increase in in population in Newham. From this, the cumulative number of deaths within the Borough can be calculated, as shown within figure 12, although these are not necessarily deaths in the borough, but deaths of residents as death registration data does not tally with people who die in the borough, so caution needs to be used.

3.5.2 The mortality rate in Newham has been significantly impacted by the COVID-19 pandemic. As of the latest data, Newham had the highest COVID-19 death rate in England, with 144.3 deaths per 100,000 population. It is also assumed that the GLA figures reflect deaths involving the virus.



**Figure 10: Death Projection for Newham 2011 -2041**  
(Source: GLA Housing Led population projections)



**Figure 11: Cumulative number of deaths within the Borough of Newham**  
(Source: GLA Housing Led population projections)

3.5.3 For the purpose of this study, the cumulative number of deaths is considered from 2021 to 2038 (the end of the proposed plan period) the cumulative number of deaths is projected to be 29,804.

### 3.6 Population of the Borough by faith groups

3.6.1 Table 8 and Figure 14 below set out the population make-up by faith group in Newham, based on the 2021 Census data.

3.6.2 Data from the 2021 census<sup>12</sup>, the most populous religious group within Newham is Christian, accounting for 35.3% of the population. Newham has a Muslim population of 122,146 which is 34.8% of the population.

3.6.3 Compared to England as a whole, in England circa 46% of the population is Christian, 7% is Muslim, 2% is Hindu, and Buddhists, Sikhs and Jews each is around 1%. The remainder is split between people with no religion and those who decided not to identify a religion.

3.6.4 Table 2 below demonstrates that in 2021, Christians made up the largest religious group in Newham, and the percentage of Christians within the Borough (35.3%), and a similar percentage of Muslims (34.8%).

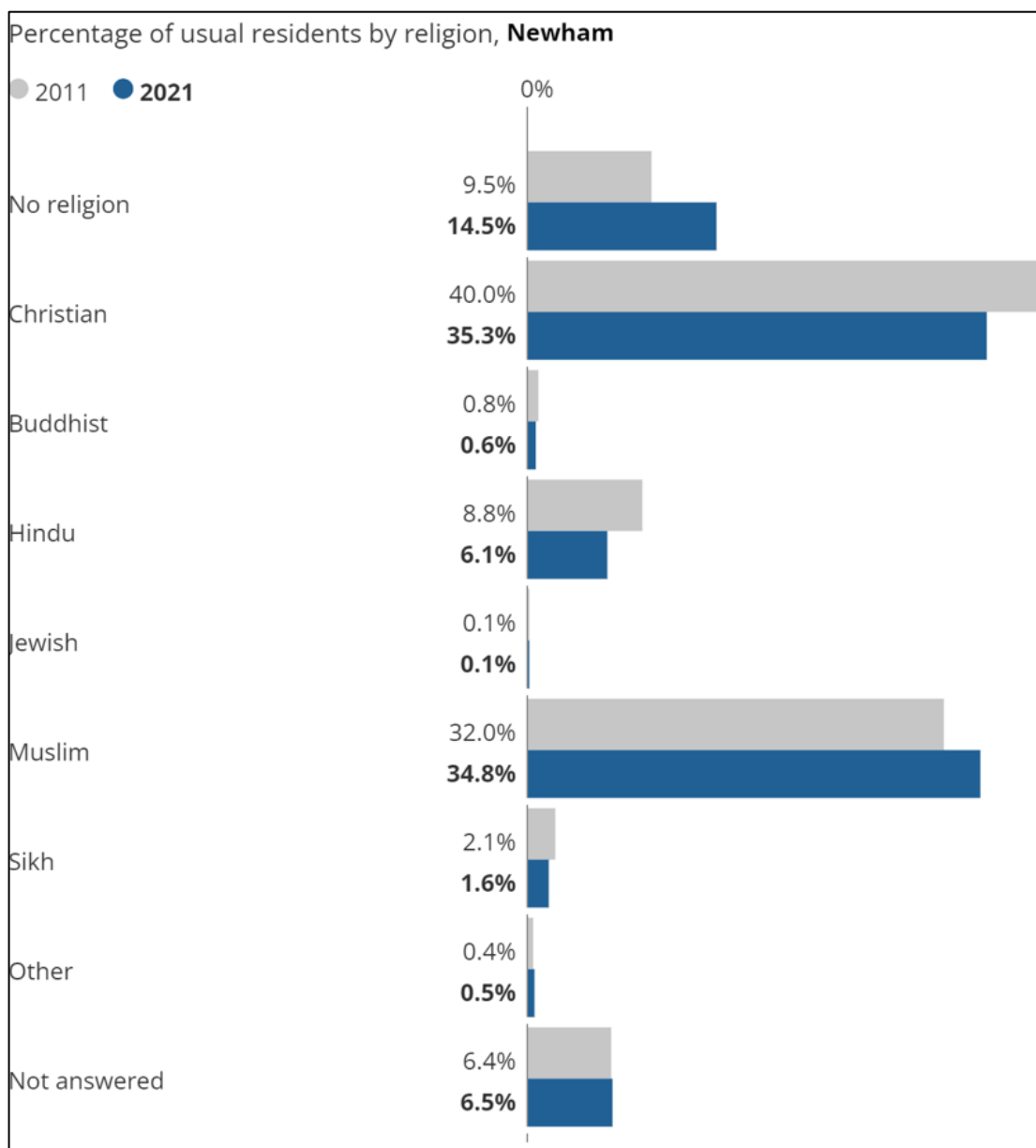
**Table 2: Makeup of the Borough by religion (Source: NOMIS ONS 2021)**

Religion	Population	Percentage of Population
Christian	123,746	35.3%
Buddhist	2,160	0.6%
Hindu	21,405	6.1%
Jewish	448	0.1%
Muslim	122,146	34.8%
Sikh	5,638	1.6%
Other Religion	1,765	0.5%
Not Answered	22,933	6.5%
No Religion	50,795	14.5%

<sup>12</sup> <https://www.ons.gov.uk/census>



3.6.5 Figure 12 sets out the population make-up by faith group in Newham, based on the 2001 and 2011 Census data. This shows, the change in percentage for each religious group within the Borough.



**Figure 22: Percentage of usual residents by religion in Newham**  
 (Source: ONS 2011-2021 Census)

3.6.6 Figure 12 above demonstrates that in 2021, 14.5% of Newham residents reported having "No religion", up from 9.5% in 2011. The rise of 4.9 percentage points was the largest increase of all broad religious groups in Newham. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses.

3.6.7 Across London, the percentage of residents who described themselves as having "No religion" increased from 21.0% to 27.1%, while across England the percentage increased from 24.8% to 36.7%.

3.6.8 In 2021, 35.3% of people in Newham described themselves as Christian (down from 40.0%), while 34.8% described themselves as Muslim (up from 32.0% the decade before).

3.6.9 There are many factors that can cause changes to the religious profile of an area, such as a changing age structure or residents relocating for work or education. Changes may also be caused by differences in the way individuals chose to self-identify between censuses. Religious affiliation is the religion with which someone connects or identifies, rather than their beliefs or religious practice.

**Table 3: Makeup of Borough by religion and % annual difference (Source: ONS 2011-2021 Census)**

Religion	% of population in the Borough		Difference in % 2011 – 2021	% increase/ decrease p/a	% of population in Newham by 2(2021)	Difference in % between England and Newham (2021)
	2011	2021				
Christian	40.0%	35.3%	-4.7%	<b>-0.47%</b>	59.38%	24.08%
Buddhist	0.8%	0.6%	-0.2%	<b>-0.02%</b>	0.45%	-0.15%
Hindu	8.8%	6.1%	-2.7%	<b>-0.27%</b>	1.52%	-4.58%
Jewish	0.1%	0.1%	0%	<b>0%</b>	0.49%	0.39%
Muslim	32.0%	34.8%	2.8%	<b>0.28%</b>	5.02%	-29.78%
Sikh	2.1%	1.6%	-0.5%	<b>-0.05%</b>	0.79%	-0.45%
Other religion	0.4%	0.5%	0.1%	<b>0.01%</b>	0.43%	-0.81%
No religion	9.5%	14.5%	5.0%	<b>0.5%</b>	24.74%	10.24%
Religion not stated	6.4%	6.5%	0.1%	<b>0.05%</b>	7.18%	0.68%

### 3.7 Forecasting percentage of different religions

3.7.1 Census projections are not undertaken for religion so there is no nationally available data on the expected number of people of different religions in the future. This study has assessed the available data from 2011 and 2021 Census (for both Newham and England).

3.7.2 The most recent ONS data available for Newham is variable on an annual basis making it difficult to establish clear trends for some religions. However, given that it provides specific data for Newham, these data sets are currently the most reliable for forecasting the future percentage changes of different religious groups.

3.7.3 This has been done by calculating the change in population of different religious groups from the data for Newham and then forecasting how the population (or percentage) of different religious groups is going to change between now and 2038 by calculating the percentage increase/ decrease per year.

3.7.4 Table 4 above illustrates the population percentage changes from the Census data for England and Newham. The Census data for England has been included in the table to identify what is going on outside Newham as this will help to identify any trends and variances further afield, thus providing a comparison between the Borough, London, and England.

3.7.5 Given the lack of exact published data, Enzygo recommends that there is a review of data every 5 years to check that populations of religious groups have changed in the way forecasted.

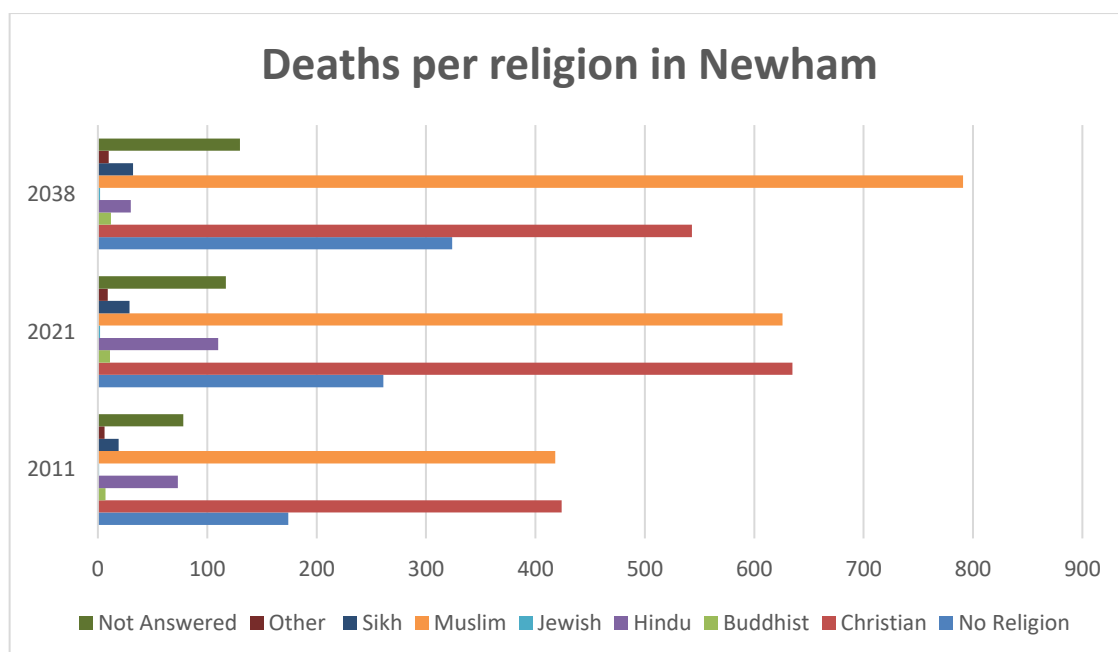
### 3.8 Deaths per religion

3.8.1 There is no published data for forecasting deaths by religions, however based on Table 8 above, indicating the percentage of usual residents by religion in Newham, it has been possible to produce estimates of deaths for each religion given the known death rate for 2011 and 2021 as recorded in the Census (Table 4). This has considered the change in population over time and change in % of different religions.

3.8.2 The forecast number of deaths per year for each religion can be approximately calculated on an annual basis (2021-2038), and the cumulative deaths for each year in Newham and assuming the same % increase or decrease each year to calculate an estimated number (Appendix 6).

**Table 4: Estimated Forecast deaths per religion (Source: ONS/Enzygo)**

Religion	Cumulative deaths 2011 – 2021	Cumulative deaths Forecast 2021-2038
Christian	5,195	10,521
Buddhist	104	179
Hindu	1,139	1,818
Jewish	11	30
Muslim	4,319	10,372
Sikh	279	477
Other	54	149
No religion	1686	4,322
Religion not stated	11	30



**Figure 33: Deaths per religion 2011, 2021 and forecast to 2038 (Source: ONS/Enzygo)**

3.8.3 From the year 2021-2038, it is anticipated that a combined total number of **27,898** deaths will occur in LBN, set out in Table 10 and Table 11, and Figure 13 which highlight the recorded deaths by religion in 2011, 2021 and forecast in 2038 (2011 Census and 2021 Census).

### Burial Requirements

3.8.4 It is important to not make assumptions about a residents' preferences in relation to their preferred burial customs and practices based on their stated religion. Someone who identifies as a particular religion may not necessarily want a funeral using the cultural traditions of that religion, similarly, someone who identifies as having no religion may desire to have a funeral with the cultural traditions and practices related to a faith or other preferences. However, making use of the best available data as set out previously in Figure 2, given the percentage of faiths choosing burials, it is estimated that **13,652** burial plots will be required during the 15-year Plan period to 2038, not including those who stated no religion or did not answer (Table 6). Most of these burials (10,268) are Muslim faith burials and dedicated Muslim cemeteries or cemeteries with provision for Muslim burials are therefore preferable.

**Table 5: Faiths Requiring Burial (Source: GLA/Enzygo)**

Religion	Cumulative deaths Forecast 2021-2038	% Choosing Burial	Number of Burials
Christian	10,521	27	2,841
Buddhist	179	91	163
Hindu	1,818	10	182
Jewish	30	96	21
Muslim	10,372	99	10,268
Sikh	477	16	76
Other	149	68	101
No Religion	4,322	-	
Not Stated	30	-	
<b>Total</b>			<b>13,652</b>

- 3.8.5 In Islam, after death, the body is prepared for burial, which should happen as soon as possible after death. Similarly, for the Jewish faith funerals should be held as soon as possible, often within 24 hours. These two faiths are highlighted as both faiths will usually require virgin burial land. While there is no definitive definition of virgin land, it is generally considered to be land that has not been significantly disturbed by human activity.<sup>13</sup>
- 3.8.6 Although for Buddhists cremation is common (see Appendix 1), burial may also be practiced depending on the cultural and regional traditions of the community. In the GLA Study 2011 91% preferred burial and this usually would not require virgin land, so the remains may be interred in a burial mound or stupa. This would also be the case for the Christians, Hindus and Sikhs who may chose burials.
- 3.8.7 In line with the projected estimates of population growth, growth of different religious communities and percentages choosing burial per religion, to accommodate all estimated burials from the period 2021-2038, approximately **6.9 hectares of land will be required** (assuming **1,976** graves per hectare). There are, however, opportunities to re-use exiting graves, intensify and extend existing burial sites.
- 3.8.8 Of the 13,652 projected burial plots required, at least **3,262** burials could potential re-use existing graves. The remaining **10,289** would require virgin burial plots and specialist facilities, this is predominantly for Muslim and Jewish burials and approximately **5.3 ha** would be required to accommodate this.
- 3.8.9 To identify whether Newham has enough existing burial space to meet this need, as far as possible this study examines the potential options, including the remaining capacity and re-use of existing graves.

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<sup>13</sup> See Glossary

## 4.0 Opportunities to Intensify and Extend Existing Burial Sites in the Borough

### 4.1 Introduction

- 4.1.1 As indicated in the Chapter 3, approximately 13,652 burial plots are required to meet need to 2038, identified in Table 6. As stated of these, 10,289 would require virgin burial plots and specialist facilities, this is predominantly for Muslim and Jewish burials. Given the other faith preferences indicated in Table 6, the remaining need of approximately 3,200 burials could re-use existing graves.
- 4.1.2 This Chapter examines the existing cemeteries in Newham and considers how intensification (using underutilised land within exiting cemeteries and reusing graves) and extensions could contribute to achieving the required need. Of these options, some intensification and extensions would meet the need for virgin burial plots and specialist facilities.
- 4.1.3 In respect of extensions, where there is undeveloped land and/or unallocated land adjacent to the existing site, an extension could be an efficient way of providing additional capacity. This could be a relatively straightforward process if the existing cemetery owner/operator own the land and it does not serve another specific purpose. However, if the land is owned by a third party, this process could be less straightforward.

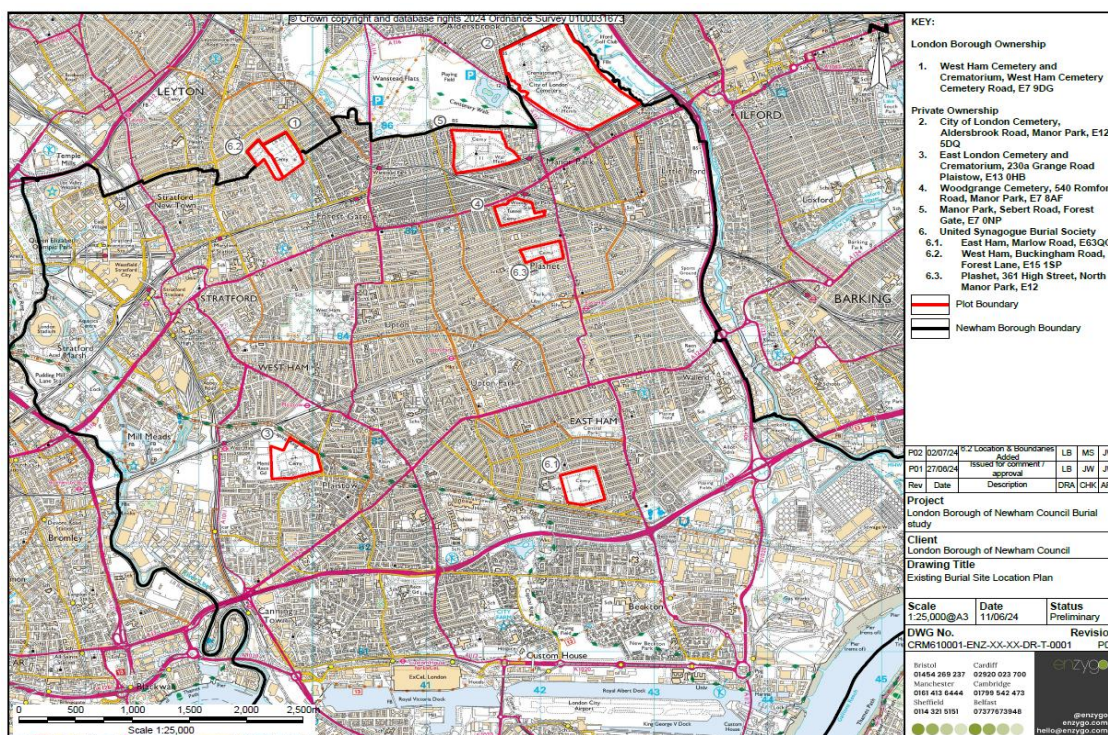


Figure 14: Existing Cemeteries in Newham (Source: LBN/Enzygo,2024)

## 4.2 Potential for intensification and extension

4.2.1 The initial exercise to establish the potential for intensification and extension was identified by desktop aerial view assessment. Suitability of intensifying and extending the existing sites has been undertaken on a high-level site-by-site basis, as it depended upon a wide range of factors, specifically whether it is physically possible, and potential environmental impacts caused by extension and intensification. As outlined in section 2.9, a more detailed assessment of these constraints should be undertaken in any future phase 2 work, should a site be promoted as a burial site. A matrix template has been developed to aid this process. This is available in Appendix 2.

### City of London Cemetery

4.2.2 City of London Cemetery & Crematorium (Figure 15) covers an area 68.06 hectares and is by far the largest cemetery within LBN. There is a small area on the eastern edge that lies within Flood Zone 2, although there are some flood defences in place along the river at this point. There is some risk of 1:100 years surface water flooding in small pockets within the centre of the cemetery.

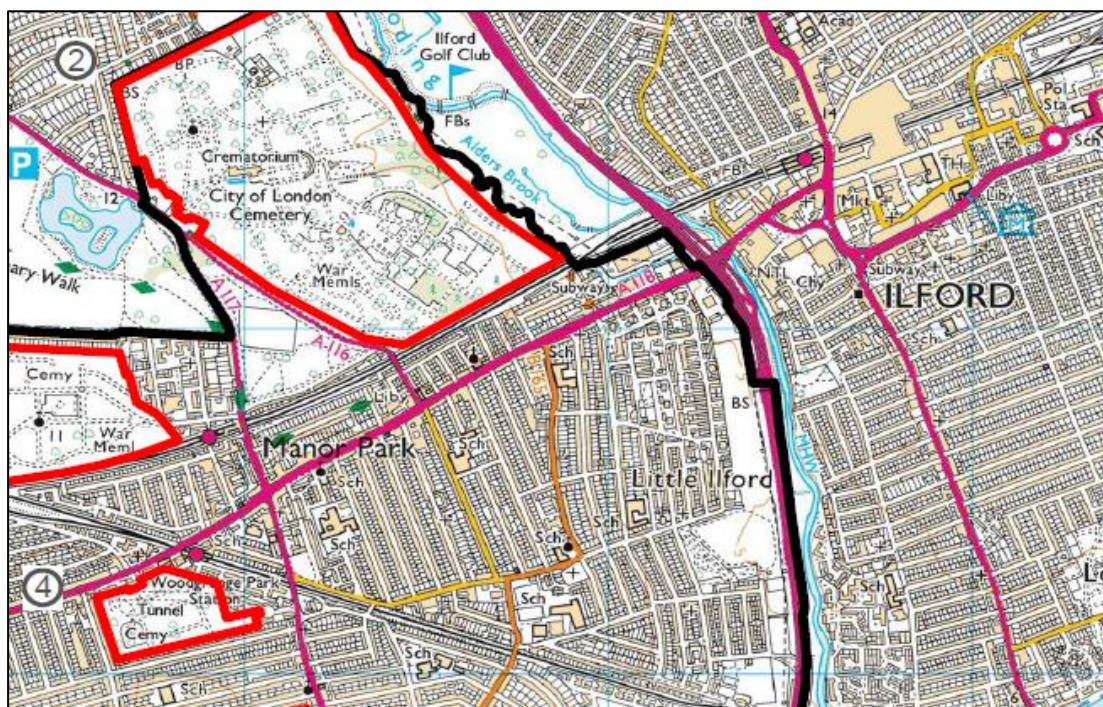
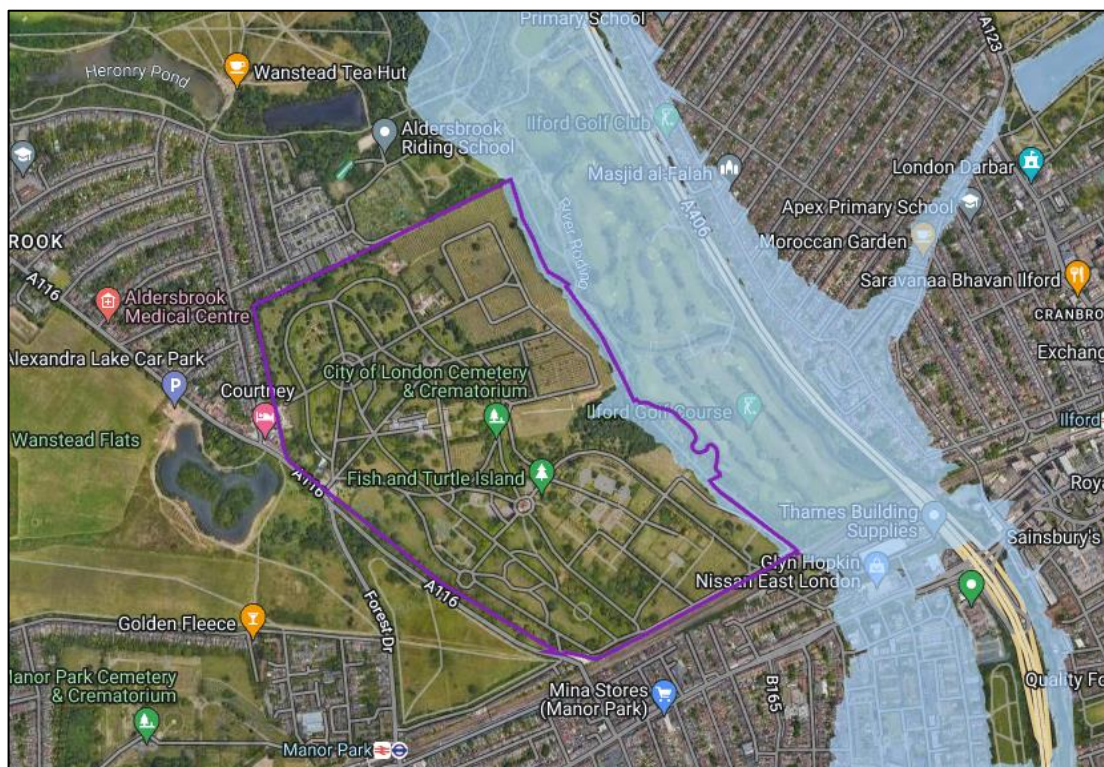


Figure 15: Extract City of London Cemetery & Crematorium (circled number 2)

(Source: LBN/Enzygo, 2024)



**Figure 16: Flood Zone 2/3 – River Roding  
(Source: Environment Agency, 2024)**

4.2.3 The cemetery is owned by the Mayor and Commonalty and Citizens of the City of London Conservators of Epping Forest. The cemetery lies within the Metropolitan Green Belt and is a registered Grade 1 Park and Garden with Historic England and designated as open space in the adopted Local Plan. It has good access to public transport with Manor Park and Ilford Tube Stations within easy walking distance.

### **Opportunities for Intensification**

- 4.2.4 There are areas within the existing cemetery that appear to be open and maintained areas that could be appropriate for intensification, although it is unknown whether they have historically been used for burials.
- 4.2.5 Within the City of London cemetery, five (5) potential areas have been identified and are indicated in Figure 17. Figures 18-21 show the sites in more detail.





**Figure 17: Potential existing space within City of London Cemetery & Crematorium  
(Source: Google Maps, 2024)**



**Figure 18: Site 1: City of London Cemetery & Crematorium  
(Source: Google Maps, 2024)**



Figure 19: Site 2 City of London Cemetery & Crematorium (Source: Google Maps, 2024)



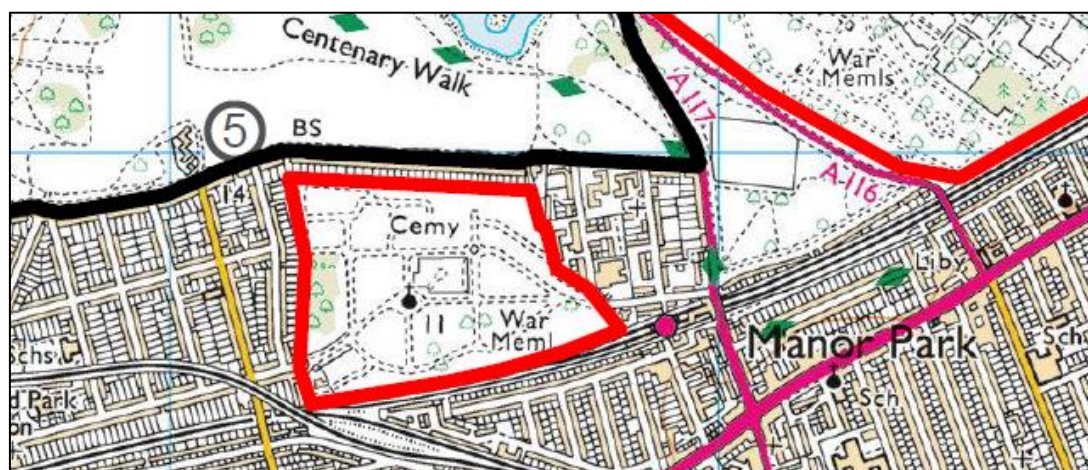
Figure 20: Site 3 City of London Cemetery & Crematorium (Source: Google Maps, 2024)



**Figure 41: Sites 4 and 5 City of London Cemetery & Crematorium**  
(Source: Google Maps, 2024)

- 4.2.6 These 5 areas could provide approximately an additional **1.97** ha of land available for burial plots if required. Although areas 4 and 5 are adjacent to the memorial gardens for ashes from the crematorium and these two provide 0.06 ha (647m<sup>2</sup>). This would leave approximately **1.91 ha** available for new burials at this cemetery. If it is found to contain historical graves, then re-use of the grave may be feasible.
- 4.2.7 The City of London have advised that they there is no virgin land and would not be open to designating a separate area for faith burials. However, these areas need to be examined in more detail as if it contained historical graves, it would rule out some faiths but could potentially accommodate more memorial gardens for ashes

## Manor Park Cemetery



**Figure 22: Extract of Manor Park Cemetery & Crematorium (circled number 5)  
(Source: LBN/Enzygo, 2024)**

- 4.2.8 Manor Park Cemetery (Figure 22) covers an area of approximately 16.9 ha and not registered on Land Registry although as with the City of London Cemetery, the land to the north and east is owned by the Mayor and Commonalty and Citizens of the City of London Conservators of Epping Forest so it is likely to be under the same ownership. The site is allocated in the adopted Local Plan as Green Space, Open Space and a Site of Importance for Nature Conservation. It is also adjacent to the Conservation Area and an Area of Townscape Value on the northern boundary.
- 4.2.9 The cemetery is not located in any Flood Zone as identified on the Environment Agency Flood Maps.



**Figure 23: Manor Park Cemetery and Crematorium (Source: Google Maps, 2024)**



**Figure 24: Site 1 and 2 within Manor Park Cemetery  
(Source: Google Maps, 2024)**

### **Opportunities for Intensification**

4.2.10 The cemetery is well used and very dense in terms of burials and memorials although there are two potential sites to the southeast of the cemetery that could be further explored. The site contains two areas of woodland to the west and southern boundaries, however, there appears to be the potential for burial space available within the cemetery itself for intensification (Figure 23 & 24). Cumulatively these two areas could provide approximately **0.56 ha**. The available spaces appear to have undergone some groundworks and a search on the Newham Council Planning Applications search indicates that a planning application (21/01922/FUL) for re-mounding works to allow the reclamation of graves has been approved (**0.32 ha**).

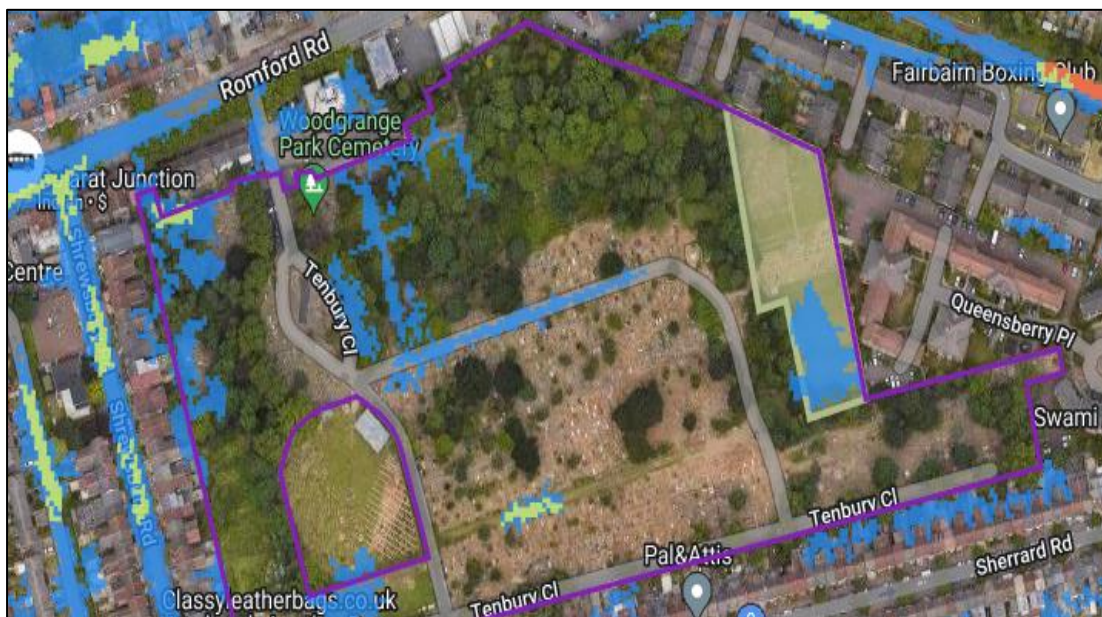
The statement for the application states that ‘the proposal is that this area could become available for new lawn burials in approximately two years’ time’. Hence, it is anticipated that Manor Park Cemetery & Crematorium are already in the process of preparing additional burial space at this cemetery.

### Woodgrange Park Cemetery



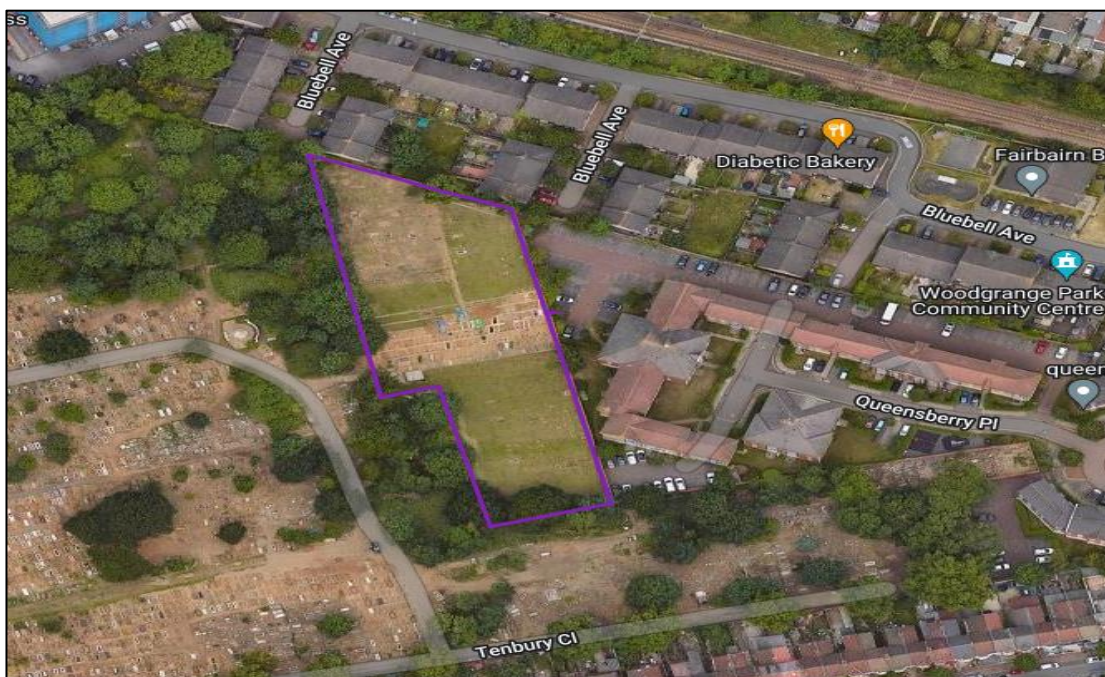
**Figure 25: Extract Woodgrange Park Cemetery (circled number 4)  
(Source: LBN/Enzygo, 2024)**

4.2.11 Woodgrange Park Cemetery (Figure 25) covers an area of 6.2 hectares and is designated as Open Space in the Adopted Local Plan. There is some risk of 1:1000 years surface water flooding in small pockets and (Figure 27).



**Figure 26: Land subject to 1:1000 year surface water flooding at Woodgrange Park Cemetery (Source: Environment Agency, 2024)**

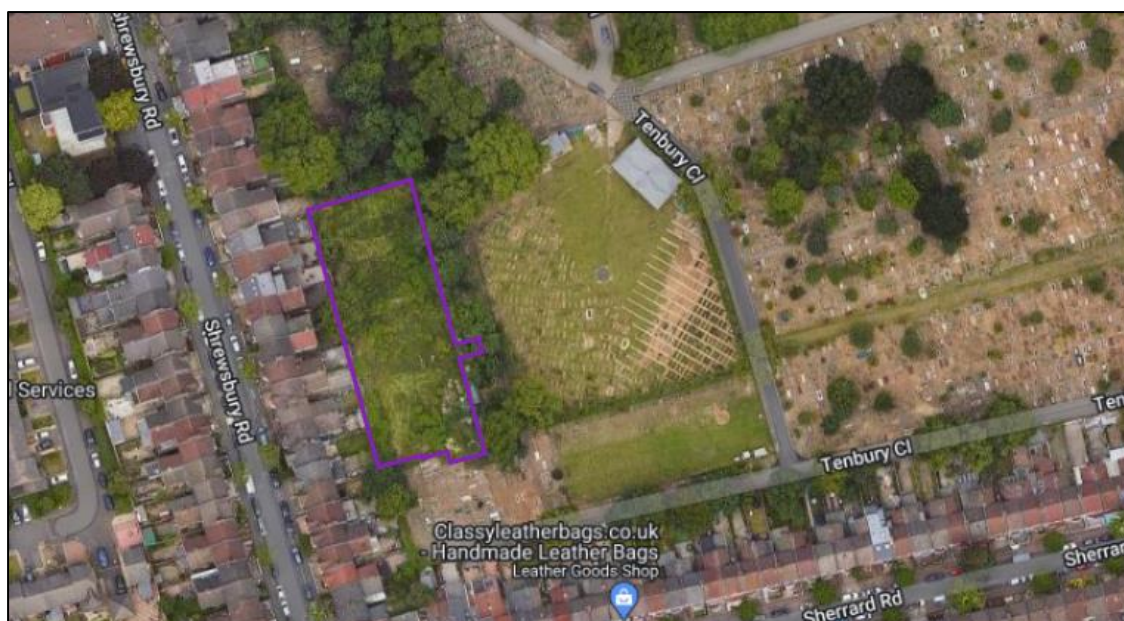
4.2.12 It is a privately owned cemetery, owned by Badgehurst Limited and a parcel to the east leased on a 999 year lease to Tottenham Park Islamic Cemetery Association (Figure 27). There is also an area to the west of the cemetery that is owned in freehold by the Muslim Patel Burial Trust (Figure 28) and a new area of 1866 m<sup>2</sup> leased to the Muslim Patel Burial Trust. (Figure 30).



**Figure 27: Land Leased to Tottenham Park Islamic Cemetery Association at Woodgrange Park Cemetery (Source: Land Registry, 2024)**



**Figure 28: Land Owned by the Muslim Patel Burial Trust at Woodgrange Park Cemetery (Source: Land Registry, 2024)**



**Figure 29: Land Leased by the Muslim Patel Burial Trust at Woodgrange Park Cemetery (Source: Land Registry, 2024)**

### Opportunities for Intensification

4.2.13 This is clearly an active cemetery with dedicated areas for the Muslim faith. These areas cover approximately 3.87 ha within the overall 6.2 ha site. The land leased Tottenham Park Islamic Cemetery Association (Figure 27) provides 0.42 ha of land and from the desk-based assessment it appears that about half (**0.21 ha**) remains available for burial. The land leased by the Muslim Patel Burial Trust to the west of the site close to Tenbury Close, provides an area land for intensification of at least **0.08 ha** (Figure 28). The Trust also own (purchased in 2021) an adjoining this area to the west which could provide a further area for intensification of **0.19 ha** (Figure 29).

4.2.14 Woodgrange Park Cemetery therefore appears to have capacity for Muslim burials on at least **0.48 ha**, which could accommodate approximately **949** burials. The wooded area to the north could provide a further area for intensification in the future.

### West Ham Cemetery and West Ham Jewish Cemetery

4.2.15 West Ham cemetery (Figure 31) covers an area of 8.1 hectares and is designated as Open Space and Green Space and a Site of Importance for Nature Conservation (Sinc) in the Adopted Local Plan. There is some risk of 1:1000 years surface water flooding in small pockets and (Figure 33). It is the only cemetery owned by Newham Council.







**Figure 32: Land subject to 1:1000 year surface water flooding at West Ham Cemetery (Source: Environment Agency, 2024)**

4.2.16 The site adjoining to the east is the West Ham Jewish Cemetery (Figure 34) and covers an area of 4.07 ha. It is designated as Open Space and Green Space and a Site of Importance for Nature Conservation (SINC) in the Adopted Local Plan. It is the owned by United Synagogue Trusts Limited and hosts the Rothschild Mausoleum.

### **Opportunities for Intensification**

4.2.17 Both cemeteries are densely populated with burial plots.

4.2.18 At West Ham cemetery reuse currently takes place but limited to approximately **400 -700**, as many reused graves contain significant remains in conflict with their dignity in death approach. It is highly unlikely to offer the opportunity to intensify the cemetery.

4.2.19 West Ham Jewish Cemetery is a closed cemetery.



Figure 33: West Ham Jewish Cemetery (Source: Google Maps, 2024)

### Plashet Jewish Cemetery

4.2.20 Plashet Jewish Cemetery (Figure 35) covers an area of 5.2 hectares and is designated as Open Space and Green Space in the Adopted Local Plan. There is a small risk of 1:1000 years surface water flooding in small pockets and (Figure 36). It is the only cemetery owned by The United Synagogue Trust Limited. Again, this cemetery is densely populated with burial plots, and it look highly unlikely to offer the opportunity to intensify the cemetery although contact should be made to establish the current position.

### Opportunities for Intensification

4.2.21 This is incredibly dense and no opportunity for further intensification of use. It is now effectively closed, with only one burial in the past few years.



4.2.22 East London Cemetery (Figure 35) covers an area of 11.22 hectares and is designated as Open Space and Green Space in the Adopted Local Plan. It is a Site of Importance for Nature Conservation (SINC) in the Adopted Local Plan. Over half of the cemetery lies with Flood Zone 2 and at least a ¼ lies within Flood Zone 3 and has a high probability of flooding (Figure 37).

4.2.23 As this is an established cemetery, opened in 1871, flooding was not regarded as an issue at the time it was planned. It would be useful to establish with the Environment Agency what the position is for re-using graves in flood zones 2 and 3.



Figure 36: Flood Zone 2 & 3 – River Thames (Source: Environment Agency, 2024)

### Opportunities for Intensification

4.2.24 This cemetery is densely populated with burial plots, and it looks highly unlikely to offer the opportunity to intensify the cemetery although contact should be made to establish the current position. The site is also potentially affected by flooding, although it looks like there is some potential to use the land on the northern boundary for reuse of existing burial plots. It is privately owned by Dignity Funerals Limited.

4.2.25 There appears to be burial space available within the cemetery itself as seen by Site 1 within Figure 38 and 39. This site is approximately **0.77 ha** and is a separate Land Registry Title to the rest of the cemetery. This could potentially provide **1,522** burial plots.

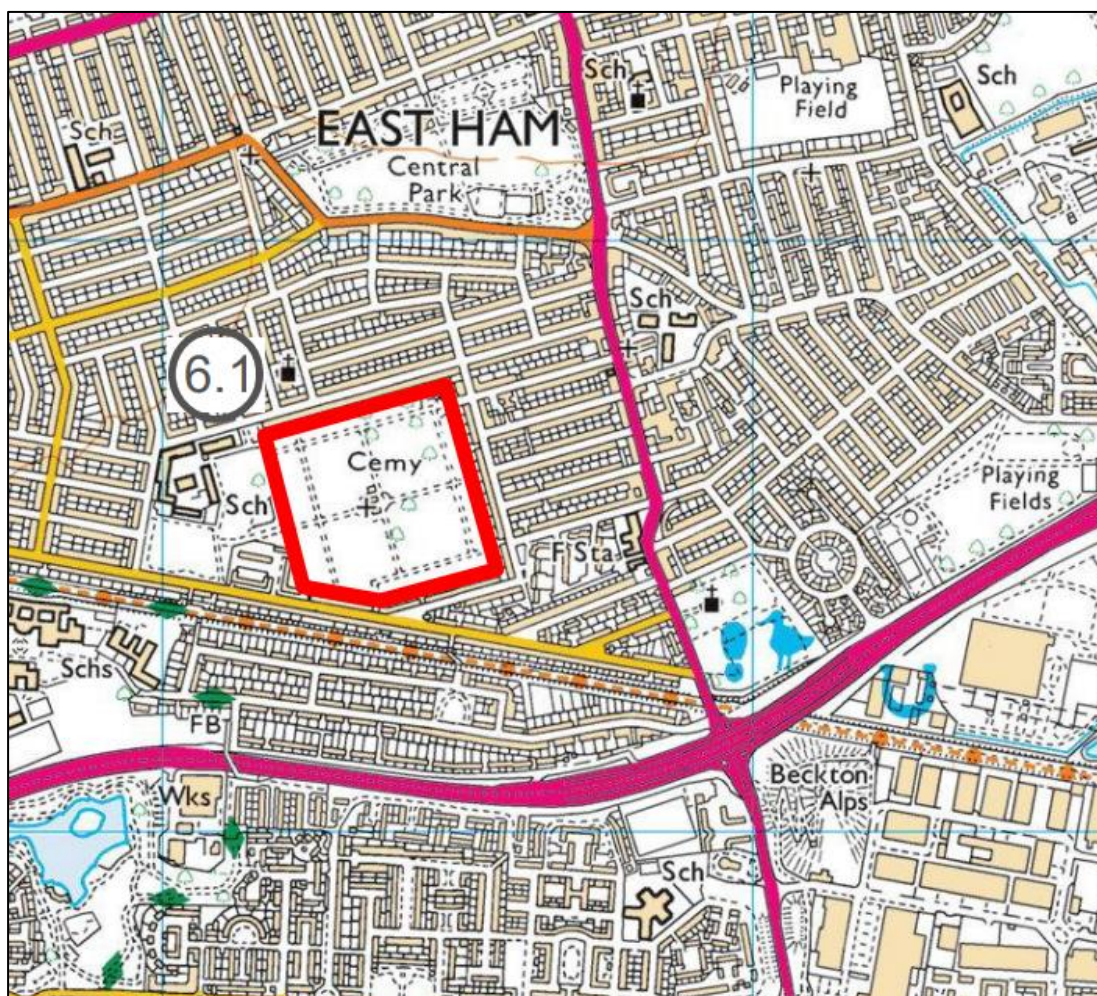


**Figure 37: East London Cemetery (Source: Google Maps, 2024)**



**Figure 385: Potential existing space within East London Cemetery (Source: Google Maps, 2024)**

### East Ham Jewish Cemetery



**Figure 39: Extract East Ham Jewish London Cemetery (Number 6.1)**

**(Source: LBN/Enzygo, 2024)**

4.2.26 East Ham Jewish Cemetery (Figure 39) covers an area of 9.8 ha and is designated as Open Space and Green Space in the Adopted Local Plan. It is a Site of Importance for Nature Conservation (Sinc) in the Adopted Local Plan. The cemetery lies with Flood Zone 2 and at very small part in the southeast corner lies within Flood Zone 3 and has a high probability of flooding (Figure 40).



Figure 40: Flood Zone 2 & 3 – River Thames (Source: Environment Agency, 2024)

### Opportunities for Intensification

4.2.27 This is incredibly dense and is subject to flooding lying with Flood Zone 2 and 3. There is no opportunity for further intensification of use. It is now a closed site.

### Reuse of existing burial plots

4.2.28 This is in addition to capacity from intensification of existing cemeteries. The number of burials that can be achieved by reusing existing graves depends on various factors, including:

- **Local Laws and Regulations:** Different areas have specific legal requirements regarding the reuse of graves, including waiting periods between burials and conditions under which a grave can be reopened.
- **Grave Size and Depth:** The physical dimensions of the grave and how deep it was originally dug. Deeper graves may allow for more burials.



- **Decomposition Time:** The length of time it takes for the remains to decompose to a point where the grave can be reused. This can vary based on soil conditions, climate, and the type of coffin or burial container used.
- **Cemetery Policies:** Individual cemeteries may have their own policies regarding grave reuse, which could include specific requirements for the duration between burials or how remains are handled.
- **Type of Reuse:** Whether the graves are being used for full body burials, cremated remains, or a combination of both.

4.2.29 To provide a general idea, a hypothetical scenario in which a cemetery allows for the reuse of graves after a decomposition period of 100 years, we can assume the following:

- A standard grave can accommodate up to three full body burials, given sufficient depth and space.
- The cemetery has legal approval and proper conditions for reusing graves.
- If a grave was used for the first burial in 1900, a second burial might be permitted in 2000, and a third burial in 2100. This would allow for three burials over a period of 200 years.
- However, if the cemetery also permits the interment of cremated remains in reused graves, the number of burials could increase significantly. For instance:
  - If up to four urns can be placed above the original burial, each grave might then accommodate several additional burials over time.

## Summary

4.2.30 Intensification of existing cemeteries is clearly beneficial where the number of additional spaces required is small and where sites have not been used intensively in the past. Based on the above desktop assessment, there appear to be some opportunities to intensify the existing cemeteries within Newham including:

- City of London Cemetery – 1.91 ha
- Manor Park Cemetery - 0.56 ha (0.32 with planning permission)
- Woodgrange Cemetery – 0.48 ha
- East London Cemetery – 0.77 ha

4.2.31 The confirmed intensifications at Manor Park Cemetery, East London Cemetery and Woodgrange Cemetery will provide **1.48 ha or 2,924 burial plots**. Woodgrange Park Cemetery has dedicated Muslim faith areas either owned or with a long term lease. By intensifying all the existing cemeteries, as identified above, this could provide approximately **3.72 ha (7,351)** burial plots. There is, however, no guarantee from this initial desk-based study that one can assume that all these potential plots will be virgin burial land suitable for Muslim or Jewish Burials. Although there are dedicated Muslim faith plots at Woodgrange Park Cemetery as already stated above.

4.2.32 To determine a precise number for a specific cemetery, there would need to be more detailed investigation in a Phase 2 study.

### 4.3 Opportunities for Extensions to Existing Cemeteries

4.3.1 There is also the opportunity to look to extend some of the existing cemetery sites identified above. Looking at each in turn.

#### City of London Cemetery & Crematorium

4.3.2 The City of London Cemetery & crematorium does have land to the west for the exploration of a possible extension. The Borough boundary is highlighted in pink and the potential site is identified by the purple highlight (Figure 41).

4.3.3 A desktop review has identified the area to the west where an extension to the City of London Cemetery may be possible. It lies within the Borough of Newham and is currently designated as Green Belt. This triangular area is **8.13 ha** and could potentially accommodate up to **16,000 burial plots**. It is an area that would need to be fully assessed through a Phase 2 study, however it is part of Wanstead Flats, a wider area of recreation and ecological significance, managed by the City of London for the recreation and enjoyment of the public. It is noted that the Council's Green and Water Space Strategy 2024 identifies that the borough has a significant shortage of publicly accessible open space, play space and food growing space. While burial space is a form of open space as described earlier, it is, by its nature, a less multifunctional space than a public park. It is unlikely to become available.

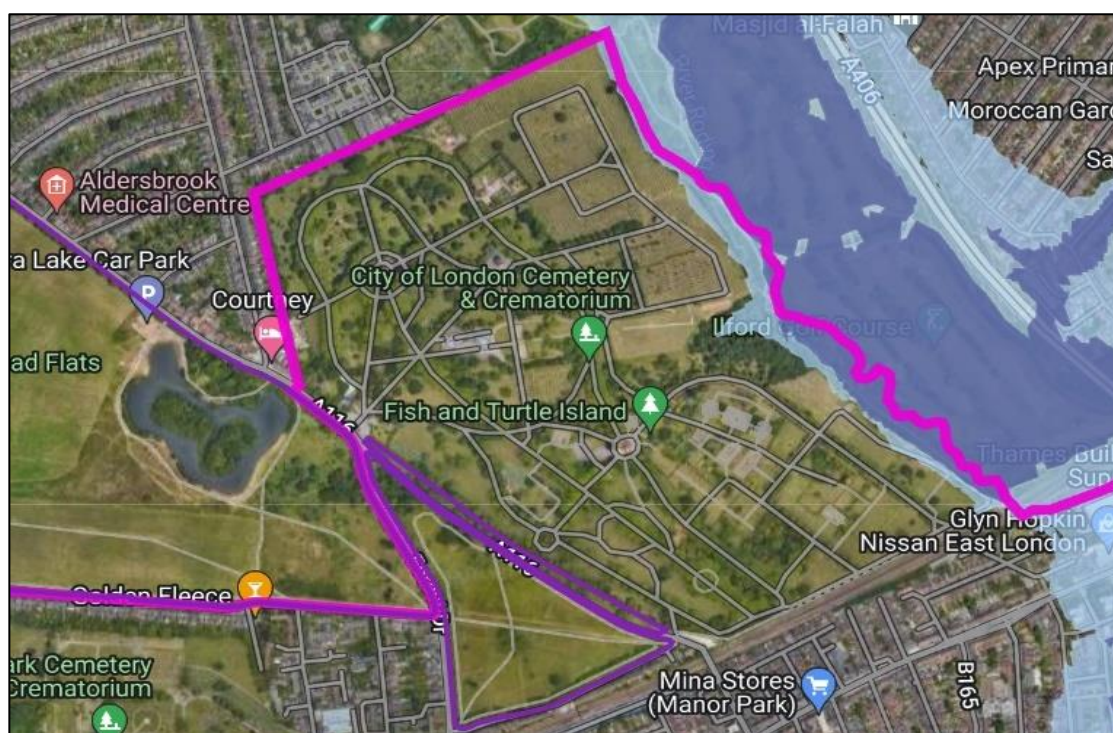


Figure 41: Possible area of extension at City of London Cemetery  
(Source: Google Maps, 2024)

### **Manor Park Cemetery**

- 4.3.4 Manor Park Cemetery does not appear to have space available for extension (Figure 22). This is largely due to the surrounding residential areas bordering the northern, eastern and western boundaries as well as the railway track bordering the south of the site.
- 4.3.5 The land lying to the north of Capel Road lies with the London Borough of Redbridge and is designated as open space and within Green Belt in the Redbridge Local Plan, although it is also owned by the Mayor and Commonalty and Citizens of the City of London Conservators of Epping Forest. Its value as an area of recreational open space is important and it is unlikely to become available.

### **Woodgrange Park Cemetery**

- 4.3.6 Woodgrange Park Cemetery does not appear to have space available for extension (Figure 25). This is largely due to the surrounding residential areas bordering the boundaries as well as the A118 Romford Road to the north and the railway track bordering the east of the site.

### **West Ham Cemetery and West Ham Jewish Cemetery & Plashet Jewish Cemetery**

- 4.3.7 West Ham Cemetery, West Ham Jewish Cemetery and Plashet Jewish Cemetery have no space available for extension (Figure 30). This is due to the surrounding residential areas bordering all the boundaries.

### **East London Cemetery**

- 4.3.8 East London Cemetery (Figure 35) appears to have space available for extension towards the west and northwest of the site (Figure 42). The space towards the northwest of the site (**2.77 ha**) is the most feasible extension area and it is owned by LBN. However, all of this space is a designated sports facility in the Newham Local Plan and the Playing Pitch Strategy 2024 highlights the need to retain and enhance all playing pitches in the borough. Any change of use would require alternative sports provision to be provided. We recommend that a further detailed assessment is carried out as part of a phase 2.



Figure 42: East London Cemetery (Source: Google Maps, 2024)

#### 4.4 Summary

4.4.1 The possible extension of the City of London Cemetery and Crematorium could provide a burial site of **8.13 ha** and could potentially accommodate up to **16,000** burial plots. In addition, a minor extension of the East London Cemetery could provide **2.77 ha** or capacity for **5,474** burials.

4.4.2 To confirm whilst these extensions are feasible and could be utilised for burials, they can be discounted due to their designation.

#### 4.5 Summary of Intensification and possible extensions of existing cemeteries

4.5.1 Table 6 below provides a summary of the existing cemeteries within Newham that has the potential to intensify the number of plots within the cemetery and/or extended the boundary to accommodate more plots. Based on the desk-based study, and applying the criteria outlined in the report, it is possible that extensions to the existing cemeteries could provide enough additional plots. However, this is subject to further detailed site investigation as part of a Phase 2 Study.

**Table 6: Summary of potential extensions and intensification**

Site	Size (hectare) (approximate)	Potential burial Capacity (1,976 graves per hectare <sup>14</sup> )	Current Use	Feasibility
<b>Extensions</b>				
City of London Cemetery (Figure 15)	8.13	16,000	Recreational Open Space	<p>Ownership of Mayor and City of London. Part of Wanstead Flats, a wider area of recreation and ecological significance, managed by the City of London for the recreation and enjoyment of the public.</p> <p>Designated Green Belt, open space, SINC.</p> <p>It is the landowner's responsibility to investigate further should they decide to extend.</p> <p>Phase 2 Study</p>
East London Cemetery (Figure 35)	2.77	5,474	Recreational open space	<p>Designated recreational open space and green space.</p> <p>Active sports facilities so unlikely unless alternative provision can be found.</p> <p>Phase 2 Study</p>
<b>Intensification</b>				
City of London cemetery Site 1 (Figure 19)	0.57	988	Cemetery	<p>Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.</p> <p>Phase 2 Study</p>

<sup>14</sup> <https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>

City of London cemetery Site 2 (Figure 20)	1.16	2,213	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
City of London cemetery Site 3 (Figure 21)	1.79	277	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
City of London cemetery Site 4 (Figure 22)	0.05	n/a	Cemetery	Appears feasible for cremation internment. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
City of London cemetery Site 5 (Figure 23)	0.01	n/a	Cemetery	Appears feasible for cremation internment. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
Manor Park Site 1 (Figure 24)	0.32	632	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
Manor Park Site 2 (Figure 25)	0.24	474	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.

				Phase 2 Study
East London Cemetery Site 1 (Figure 38)	0.44	869	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
Woodgrange Park Cemetery (Figure 31)	0.48	949	Cemetery	Appears feasible. It is the landowner's responsibility to investigate further should they decide to extend.  Phase 2 Study
<b>Extension and Intensification (Total)</b>				
City of London Cemetery	16.91	19,478	Cemetery	N/A
Manor Park	0.33	1,106	Cemetery	N/A
East London Cemetery	3.22	6,343	Cemetery	N/A
Woodgrange Park Cemetery	0.48	949	Cemetery	N/A

- 4.5.2 Through a combination of intensification and potential extension of existing cemeteries, this could theoretically provide approximately **20.94 ha** or **27,876** new burial plots. This is of course a desk-based search at this stage and many of the sites will need further detailed investigation, for the extensions in a phase 2 study.
- 4.5.3 Given there is a need to accommodate approximately **5.3** ha of new burial space to 2038, (for the virgin burial land requirements), there is, from the evidence gathered, sufficient potential additional supply of burial plots if the land in existing cemeteries within the Borough was intensified and/or extended. **This would mean that at this stage there is no requirement for new cemeteries within the Borough within the next 15 years.** However, this is in no way guaranteed and landowner intentions as well as other environmental constraints identified during the Phase 2 study may mean that they are not all feasible.

## 5.0 Potential New Burial Sites Within the Borough

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### 5.1 Introduction

5.1.1 The previous chapter demonstrates that potentially the required burial capacity could be fully met through the intensification and extensions of existing burial sites. As the extensions to those existing sites are untested at this point, it is therefore important to consider whether alternative sites exist across the borough.

5.1.2 This Chapter considers whether there are any potential new sites in the borough, either in the ownership of LBN or privately owned that could contribute to achieving the required need identified in Chapter 3.

### 5.2 Criteria for new sites

5.2.1 As part of this initial desk based assessment, the criteria and methodology set out earlier used to identify a number of potential new sites. In summary these criteria were:

- **Flood risk and geology:** The Environment Agency set out regulations relating to the development of burial sites (Protecting groundwater from human burials guidance, 2023). Cemeteries must prevent or limit groundwater pollution. You should not carry out any human burials within:
  - A groundwater source protection zone 1 (SPZ1)
  - 10 metres of the nearest field drain
  - 30 metres from the nearest spring or watercourse
  - 250 metres of any well, spring or borehole where the water is intended for human consumption or used in food production
  - areas identified as having karstic groundwater flow characteristics – these areas are highly vulnerable to pollution because groundwater can flow quickly through the many fissures and fractures in the rocks
  - on land which is liable to flooding (Flood Zone 2, Flood Zone 3 and Surface Water Flooding)

Graves must:

- Not be dug in unaltered or un-weathered bedrock.
- **Existing land use:** Is the site currently used or designated for a specific use? If so, would the loss of this space have negative impacts? Referring back to the adopted and emerging local plan policy.
- **Accessibility and highways:** Vehicle access would be required into a new cemetery site on a regular basis. Therefore, any new site will require an appropriate vehicle access, and the surrounding road network must have the ability to accommodate additional vehicle movements associated with a cemetery. A new site should ideally be accessible via public transport and sustainable transport modes, such as walking and/ or cycling. Should a new cemetery site be proposed, the planning application should include details of site access, transport impacts and accessibility.



5.2.2 Should any of the sites be taken forward to Phase 2, an assessment against the above criteria should be undertaken in more detail, and the following further criterion should be used to assess the sites if and when they are proposed.

- **Ecology:** Sites of very high ecological value may not be appropriate for a cemetery development, if the impacts of a cemetery would result in significant, adverse ecological impacts. A preliminary ecological assessment could be undertaken to assess the level of ecological value associated with a site.
- **Neighbouring land uses:** Would surrounding land uses have significant negative impacts on using the site as a cemetery?
- **Trees:** Trees within a cemetery site can add visual ecological and amenity value. However, if a new site contains a significant number of trees, there may be a requirement to remove these. The number and value of trees should be considered. Should the development of a new site result in impacts on trees, an Arboricultural impact assessment will be required.
- **Size:** A new cemetery site would have to be a minimum size to make it viable for the development of a cemetery. This would be determined by the value of the land, and any additional infrastructure requirements associated with the proposed development., Work undertaken by the Council estimate that for a site to be viable a 3 hectares size is considered
- **Landscape:** If well designed, cemeteries can have relatively low landscape impacts, particularly compared to other types of development. Depending on the site location, an assessment of landscape and visual impacts may be required to support the development of a new cemetery. Screening, such as the planting of trees and hedges can contribute to wider benefits, particularly ecological benefits.

5.2.3 This initial desk based assessment examined the potential sites using the criteria set out above. Any site identified for a new cemetery would require planning consent, and the issues detailed above, along with any further potential impacts should be assessed as part of the planning application.

### 5.3 Potential sites for new burial ground

5.3.1 As part of this initial desk based assessment, LBN provided Enzygo with a list of operational property (excel spreadsheet) and DWG shapefiles of all the suitable Council owned land. These properties form part of the agreed site area for the consideration of potential new burial sites within LBN. Enzygo then looked at other potential non-council owned sites in LBN that meet the size criteria through a combination of sources including Local Plan allocations, SHLAA, Land Registry and Google Maps.

### **Council owned sites**

- 5.3.2 A thorough review was undertaken, during which sites were filtered out. Firstly, properties which were listed as 'Building' were removed from consideration. Secondly, educational properties and schools, leisure centres, libraries, local service centres, offices, and public toilets. Additionally, sites which were considered too small of an area to sufficiently accommodate suitable burial facilities. After this process, a list of 'sites with potential' remained.
- 5.3.3 A map containing the LBN owned 'sites with potential' was produced (see Appendix 7) and a total of 20 sites were identified for further for consideration. The sites at Abbey Lane, May Green and Oak Crescent Open Space were too small (below 3 ha) and have been removed. Assessing the remaining 17 sites against the above criteria, there are 3 sites remaining for consideration.
- 5.3.4 These are Star Park, Oak Crescent Open Space and Beckton Park, providing a combined land area of **12.92 ha** and **25,529** (approximate) potential burial plots. It is expected that these sites if taken forward could provide sufficient land for new burial plots beyond the plan period,
- 5.3.5 All the identified land in LBN's ownership is existing publicly accessible open space, either a park, allotments or playing fields. It is noted that the Council's Green and Water Space Strategy 2024 identifies that the borough has a significant shortage of publicly accessible open space, play space and food growing space. While burial space is a form of open space as described earlier, it is, by its nature, a less multifunctional space than a public park. So, it is unlikely that these sites would be feasible.

## **5.4 Other potential new cemetery sites**

- 5.4.1 A thorough review was then undertaken of other sites using the following information and again, any potential sites that were clearly built on, educational properties and schools, leisure facilities, shopping centres, offices, and some car parks were removed from consideration. Additionally, sites which were considered too small of an area to sufficiently accommodate suitable burial facilities were discounted. The study looked at:

- Flood risk
- Groundwater source protection zones (SPZs)
- Local Plan and draft site allocations:
  - Housing
  - Employment
- Green Belt
- Metropolitan Open Land (MOL)
- Open space

## Flood Risk

5.4.2 As a starting point all areas within Flood Zone 2 and Flood Zone 3 were discounted. This left the area to the north and east of Stratford to East Ham and Plaistow (Figure 43).

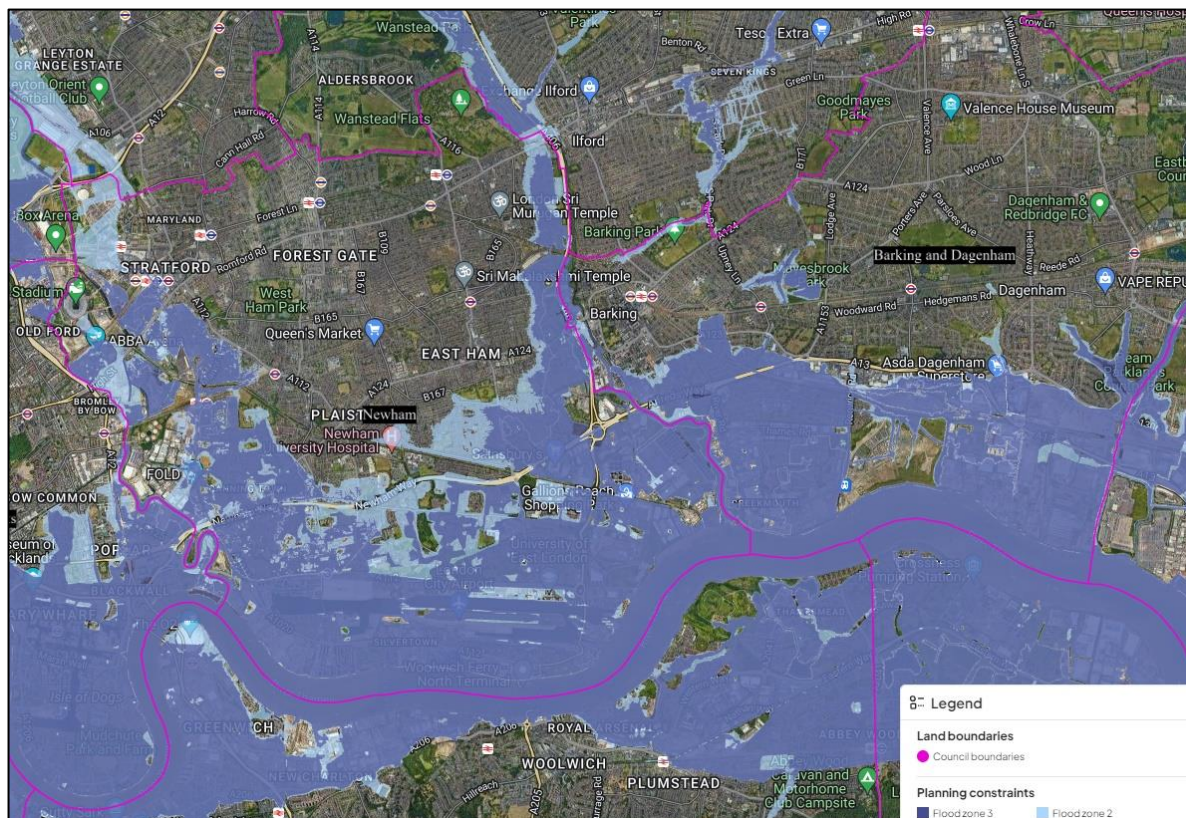


Figure 43: Flood Zones 2 & 3 (Appendix 10) (Source: Environment Agency, 2024)

## Groundwater Protection Zones (SPZs)

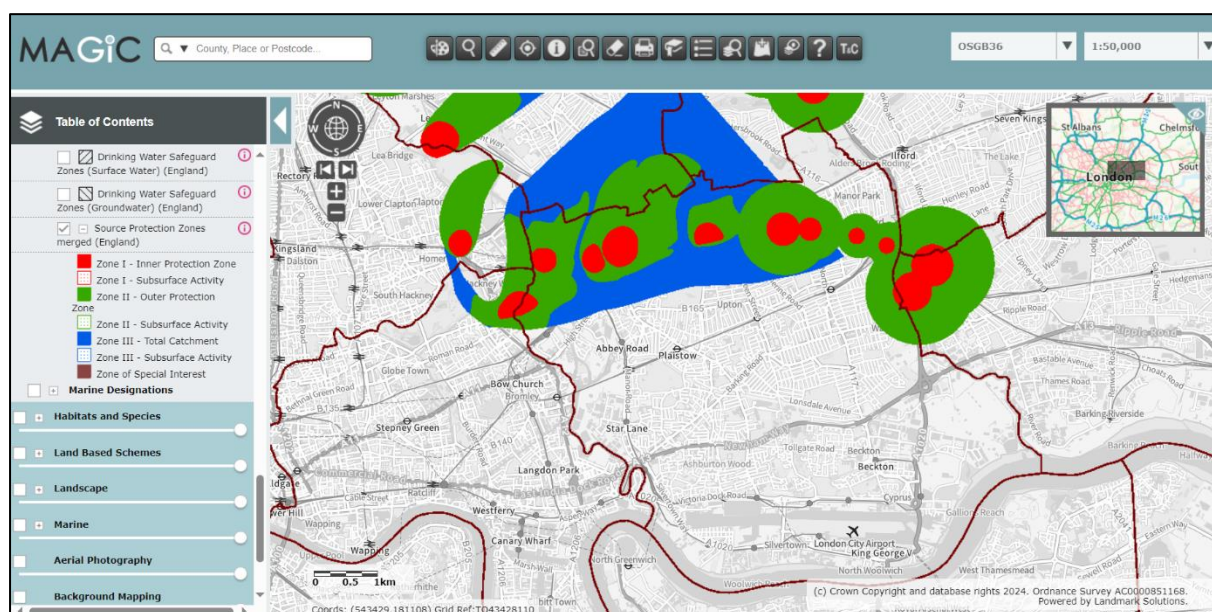
5.4.3 Groundwater supplies a third of our drinking water. In some areas of southern England, including Newham, up to 80% of the water you get from your taps is from groundwater. It also keeps many of our rivers flowing.

5.4.4 The Environment Agency (EA) must protect groundwater sources used to supply drinking water from pollution. Sources include wells, boreholes and springs. The EA have defined SPZs – they are zones which show the level of risk to the source from contamination. This could be from any activity that might cause pollution in the area and can include burial plots. The closer the activity, the greater the risk.

5.4.5 The EA have used models to estimate, how long it will take for a pollutant to travel from the water below ground (any point below the water table) to the source (the point where water is taken) the area around the source which needs protecting from potential pollutants.

5.4.6 This is shown by three zones:

- **Inner zone – SPZ1 (Red)**- This zone is 50 day travel time of pollutant to source with a 50 metres default minimum radius.
- **Outer zone – SPZ2 (Green)** - This zone is 400 day travel time of pollutant to source. This has a 250 or 500 metres minimum radius around the source depending on the amount of water taken.
- **Total catchment - SPZ3 (Blue)** - This is the area around a supply source within which all the groundwater ends up at the abstraction point. This is the point from where the water is taken. This could extend some distance from the source point.



**Figure 44: Groundwater Source Protection Zones in Newham (Appendix 11)**  
(Source: Magic Map, 2024)

5.4.7 The SPZs essentially stretch from Stratford in the west to the River Roding on the east boundary close to Barking. This covers the land in Little Ilford Park and Leigh Road Sports Ground.

**Adopted and Draft Local Plan Allocations – Housing & Mixed Uses**

5.4.8 In both the adopted and emerging Newham Local Plans, several sites are designated for housing and mixed-use developments to support the borough's growth and regeneration objectives.

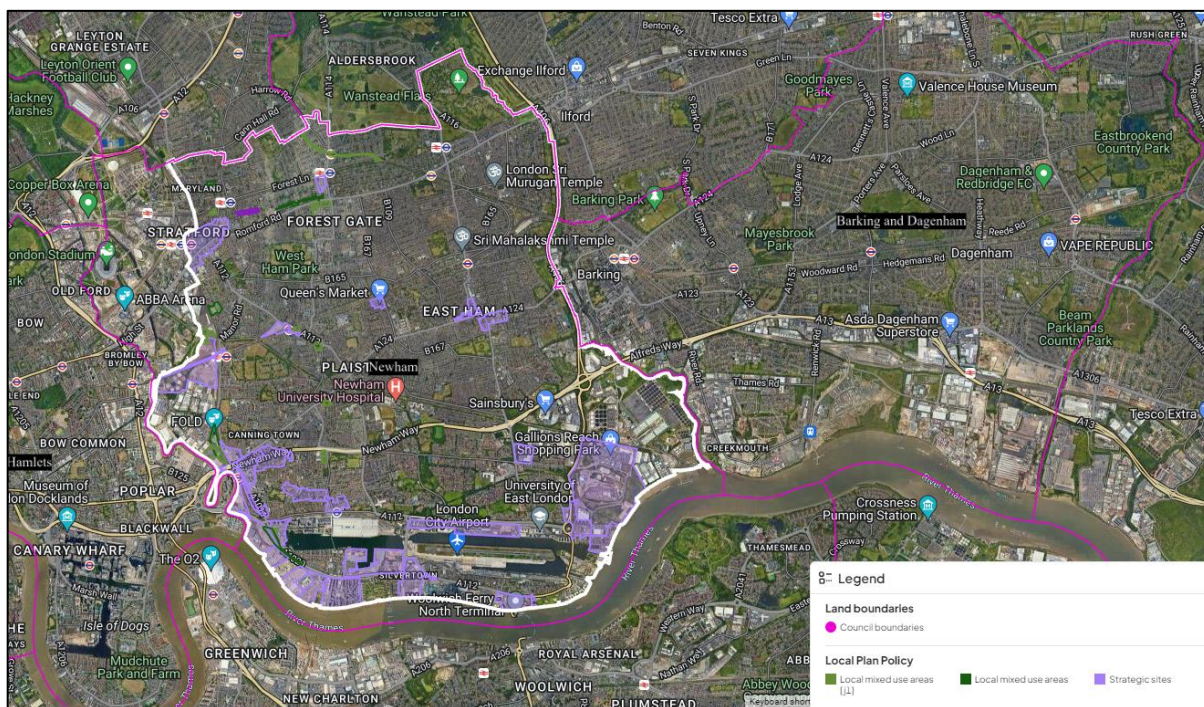
5.4.9 **Adopted Newham Local Plan (2018)** - The 2018 Local Plan outlines numerous areas for development, focusing on housing and mixed-use projects to address the borough's housing needs and promote sustainable growth. Key growth locations include:

- **Stratford:** Major housing and mixed-use developments, leveraging its transport links and existing infrastructure.
- **Canning Town and Custom House:** Significant regeneration projects to create new homes, commercial spaces, and community facilities.
- **Royal Docks:** Large-scale mixed-use developments, incorporating residential, commercial, and leisure uses.

5.4.10 **Emerging Newham Local Plan (2024)** - The emerging Local Plan aims to extend the planning horizon to 2038, incorporating updated housing targets and strategic sites for development. The draft plan highlights:

- 45 site allocations
- 44 employment designations
- With major growth focused in the London Plan opportunity areas of Beckton and the Royal Docks; Stratford and Poplar Riverside

5.4.11 These allocations reflect Newham's commitment to accommodating population growth, enhancing the urban environment, and ensuring sustainable development across the borough.



**Figure 45: Housing and Mixed use Allocations in the Adopted and Emerging Local Plan (Appendix 12)(Source: LBN/Searchland, 2024)**

## Adopted and Draft Local Plan Allocations – Employment

5.4.12 The adopted and draft Local Plan employment allocations include local industrial locations, strategic industrial locations, employment hubs and micro business opportunity areas.



**Figure 46: Employment Allocation in the Adopted and Emerging Local Plan (Appendix 13)**  
(Source: LBN/Searchland, 2024)

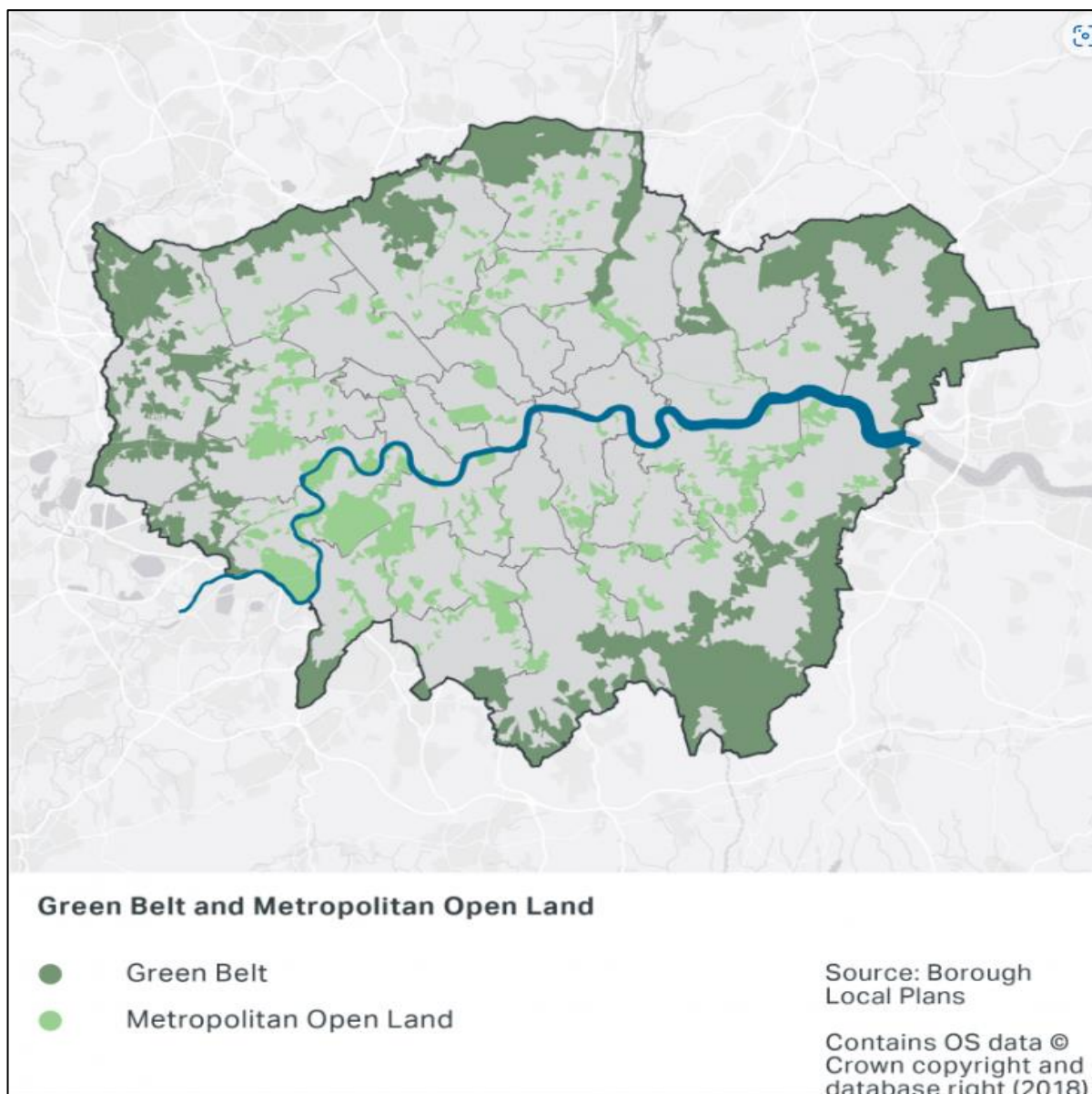
### Green Belt and Metropolitan Open Land

5.4.13 In Newham, Green Belt and MOL have equal status and are integral to the Borough’s planning strategy. Most development is not acceptable in green belt and by extension MOL, with a few exceptions including for burial space and associated infrastructure so long as it doesn’t impact the openness and the land is kept permanently open.

5.4.14 As mentioned above, cemeteries are considered acceptable development in the Green Belt; This means that traditional lawn graves are deemed more favourably over Mausoleums, vaults and curbed graves and the provision of burial space must be in an appropriate location for the benefits to be fully achieved.

5.4.15 Any sites identified should (if possible) benefit from existing infrastructure (i.e. access roads) or be in a location where infrastructure could be provided relatively simply (i.e. without the need for large levels of new infrastructure).

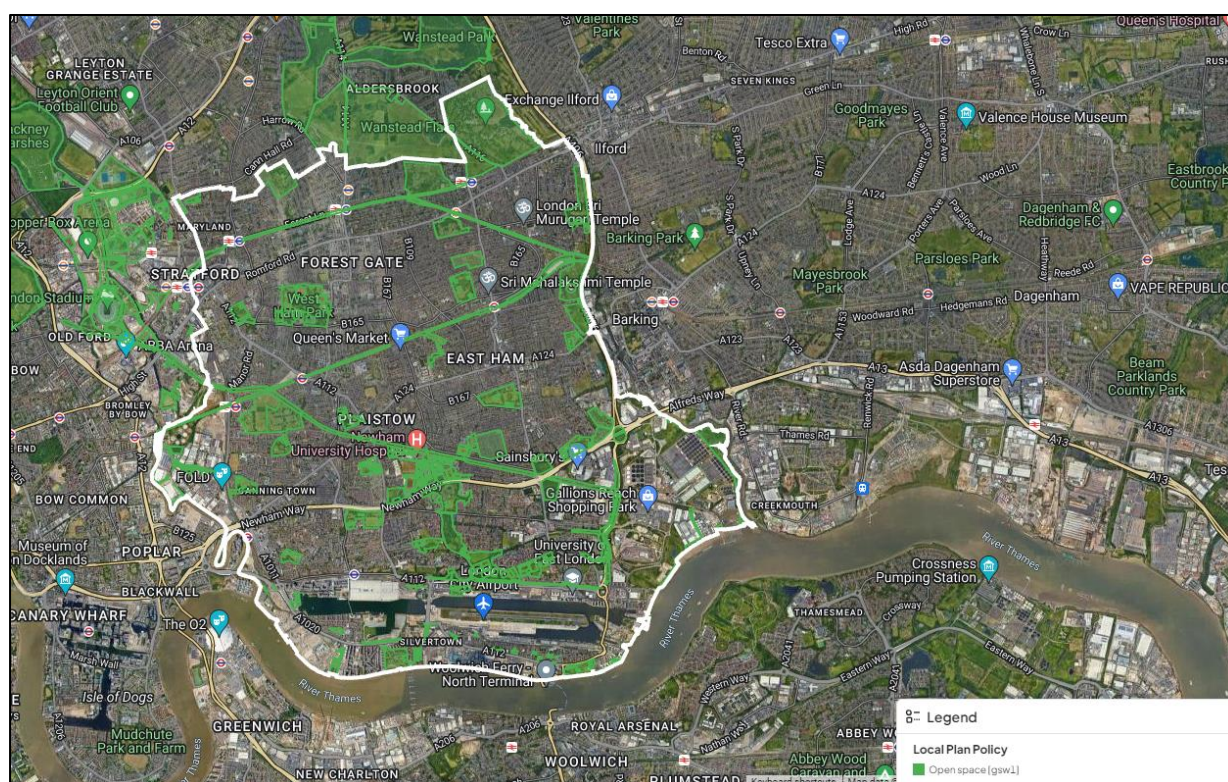
5.4.16 Given the urban context of Newham, pressure on land means it is even more important to ensure that open space resources meet multiple needs. When considering potential new sites any recommendations made within this study, it is important that they are consistent with the NPPF. Sites inside MOL and Green Belt could provide opportunities for burial space.



**Figure 47: Green Belt and Metropolitan Open Land (MOL)  
in Adopted and Emerging Local Plan (Appendix 14)  
(Source: LBN/Searchland, 2024)**

## Open space

- 5.4.17 In the adopted and emerging Newham Local Plan, open space plays a crucial role in the borough's development and environmental strategies. Open spaces in Newham are designated to ensure that residents have access to recreational areas, green spaces, and community facilities. These spaces include parks, nature reserves, sports fields, and other public green areas.
- 5.4.18 The adopted Local Plan emphasizes the protection and enhancement of these open spaces to improve the quality of life for residents and to support biodiversity and environmental sustainability. It outlines policies for maintaining existing open spaces and creating new ones as part of new developments. This includes integrating green infrastructure into urban designs to provide environmental benefits and recreational opportunities.
- 5.4.19 The emerging Local Plan builds on these principles, aiming to address current and future needs as Newham grows. It focuses on sustainable development, ensuring that new housing and mixed-use projects include provisions for open spaces. The plan also prioritizes creating interconnected green spaces that contribute to the borough's overall ecological network, supporting wildlife and providing residents with accessible and enjoyable outdoor areas. This is because the Council's Green and Water Space Strategy 2024 identifies that the borough has a significant shortage of publicly accessible open space, play space and food growing space.

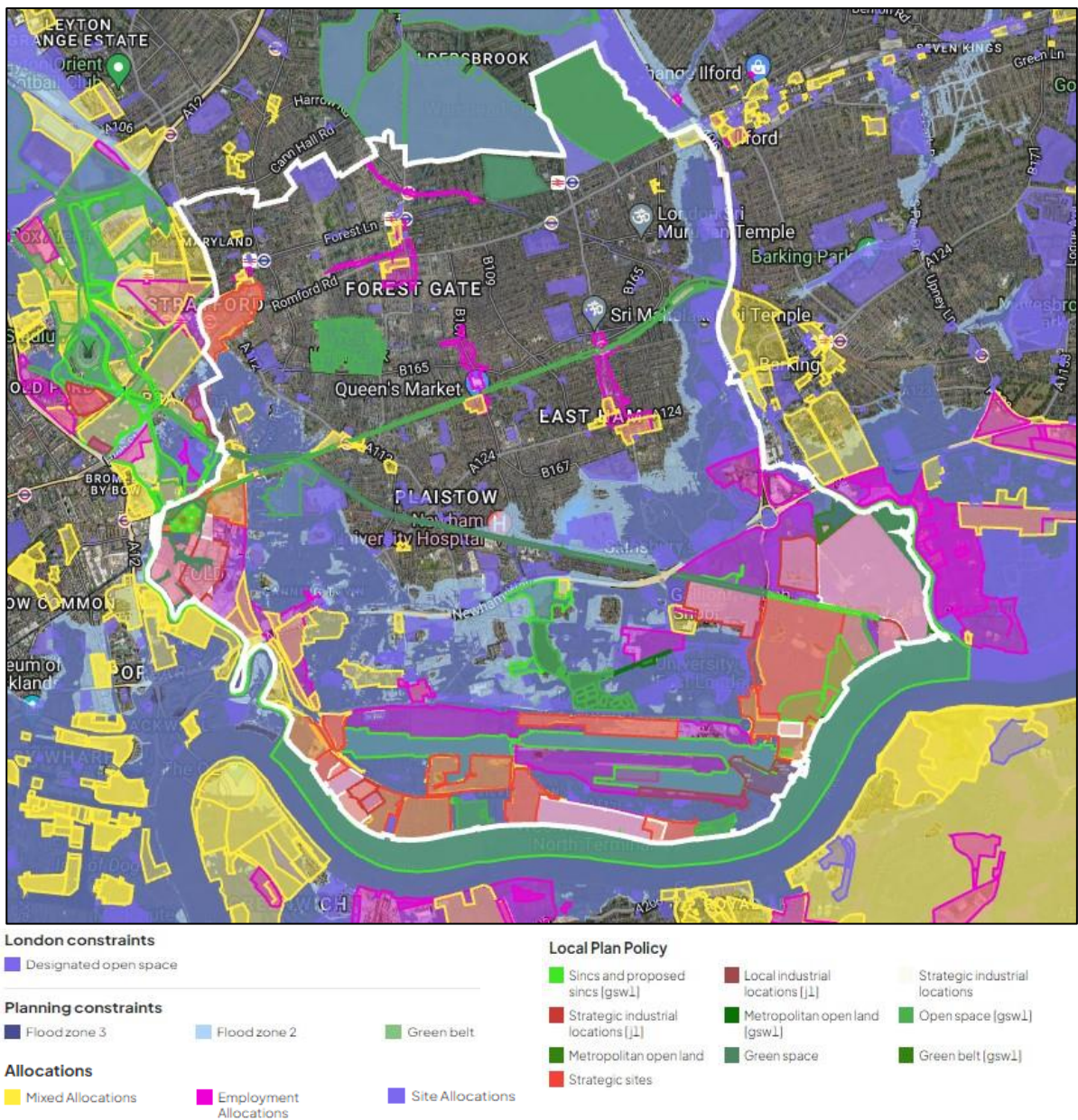


**Figure 48: Open Space in Adopted and Emerging Local Plan (Appendix 15)**  
 (Source: LBN/Searchland, 2024)



5.4.20 While burial space is a form of open space as described earlier, it is, by its nature, a less multifunctional space than a public park. The use of these spaces for burial space would need to be balanced against the need for a wider range of facilities and functionality and it is unlikely that they provide a feasible option for burial space.

5.4.21 By taking each layer of constraints, allocations and designations into account and examining the policy wording and the competing demand for the sites that have been considered above, all land that could potentially support a new cemetery are either allocated or designated for other uses in the adopted and emerging local plan, and as such there are no clear opportunities within the borough.



–Figure 49: Allocations and Designations (Appendix 16) (Source: LBN/Searchland, 2024)

### **Sites in adjoining Boroughs providing Burial Space**

5.4.22 As mentioned within section 2, there are at least two sizeable cemeteries and burial sites outside the Borough to the north within Havering at Harold Wood Muslim Cemetery and Maylands Gardens of Peace in Romford. There is also the large and mixed faith cemetery in Epping Forest at Sewardstone Park Cemetery.

5.4.23 All of these options are within a 45 minute travel time ideally by public transport and provide acceptable options for all faiths.

## 6.0 Conclusion and Recommendations

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### 6.1 Introduction

6.1.1 To ensure the required burial space is provided within the Plan period, Enzygo recommends that London Borough of Newham Council progress the recommendations made within this report.

### 6.2 Summary

6.2.1 It is anticipated that across the period 2023-2038, approximately **13,652** burial plots will be required during the 15-year Plan not including those who stated No Religion or did not answer in the 2021 Census. Most of these burials (**10,268**) are Muslim faith burials and dedicated Muslim cemeteries or cemeteries with dedicated Muslim Facilities, are therefore preferable.

6.2.2 Of the 13,652 projected burial plots required, at least **3,200** burials could potential re-use existing graves. The remaining **10,452** would require virgin burial plots and specialist facilities, this is predominantly for Muslim, and Jewish burials or approximately **5.3 ha** (assuming **1,976** graves per hectare).

6.2.3 As seen in Table 6, there are graves available for re-use in the Borough's cemeteries. The definitive figures for burial spaces for new plots are unknown. However, it is recognised that this does not address the needs of residents requiring virgin burial land within the borough.

6.2.4 Based on the desk-based study, by intensifying the existing cemeteries, this could provide approximately **3.72 ha (7,351)** burial plots. There is, however, no guarantee from this desk-based study to assume that all these potential plots will be virgin burial land suitable for Muslim or Jewish Burials. Although there are dedicated Muslim faith plots at Woodgrange Park Cemetery. The confirmed intensifications at Manor Park Cemetery, East London Cemetery and Woodgrange Cemetery will provide **1.48 ha or 2,924 burial plots**.

6.2.5 The possible extension of the City of London Cemetery and Crematorium could provide a burial site of **8.13 ha or 16,000** burials. In addition, a minor extension of the East London Cemetery could provide **2.77 ha** or capacity for **5,474** burials. These could provide approximately **21,474** burial plots for the borough. However, this is subject to further site investigation. To confirm whether these extensions are feasible and can be utilised for burials a further Phase 2 study will be required. However both proposed extension sites are existing publicly accessible open space, either a park and/or playing fields. It is noted that the Council's Green and Water Space Strategy 2024 identifies that the borough has a significant shortage of publicly accessible open space, play space and food growing space. While burial space is a form of open space as described earlier, it is, by its nature, a less multifunctional space than a public park. These sites do not, therefore, appear to provide a feasible option for burial space.

- 6.2.6 Based on the desk-based study utilising council data, it is understood that 3 sites (Star Park, Oak Crescent Open Space and Beckton Park) have the potential for burial land use, providing a combined land area of **12.92 hectare and 25,529** (approximate) potential burial plots. It is expected that these sites could provide sufficient land for new burial plots, subject to further investigation.
- 6.2.7 Parts of Star Park and Oak Crescent Open Space lie within Flood Zone 2 and Beckton Park lies fully within Flood Zone 3 essentially ruling it out. Any facility proposed on Star Park and Oak Crescent Open Space will require careful planning and consideration of all the policy issues.
- 6.2.8 All the identified land in LBN's ownership is existing publicly accessible open space, either a park, allotments or playing fields. It is noted that the Council's Green and Water Space Strategy 2024 identifies that the borough has a significant shortage of publicly accessible open space, play space and food growing space. While burial space is a form of open space as described earlier, it is, by its nature, a less multifunctional space than a public park. These sites do not, therefore, appear to provide a feasible option for burial space.
- 6.2.9 With regards to capacity in adjoining authority, it is understood that Tower Hamlets, and Hackney have no provision. Waltham Forest boroughs capacity status is 'critical' with a reliance on created graves and burial space likely to be exhausted. Redbridge and Barking & Dagenham, Havering and further afield in Epping Forest have capacity for burials. We recommend that Newham Council contact the neighbouring boroughs to confirm capacity and share information.
- 6.2.10 This report has identified that, based on a desk-top review, required capacity within and beyond the Plan period could be achieved through a combined approach of using existing sites via intensification of cemeteries, extending existing sites, and identifying new sites and working with adjoining authorities. In all cases, further investigations would be required to establish if the extensions and new sites are feasible, drawing on more detailed evidence and assessments than possible at this stage, so it is not possible to identify and designate a suitable site(s) at this stage. If a site were to be brought forward for more detailed exploration, this report sets out factors that should be considered when reviewing new sites and a template that can be used to ensure all the constraints are addressed. Any planning application would be required to be accompanied by relevant technical assessments, to demonstrate meeting the requirements set out in emerging Local Plan policy S15.



## Appendix 1: Burial Practices by Religion

Religion	Common Funeral and Burial Practices
Buddhism	Cremation is common, but burial may also be practiced depending on the cultural and regional traditions of the community. In some cases, the remains may be interred in a burial mound or stupa.
Catholicism	Funeral mass and last rites are common, and burial is the preferred method of interment. Cremation is allowed but not preferred, and the ashes should be interred in a sacred place such as a cemetery or columbarium rather than scattered.
Church of England	Funeral service can take place in a church or other location, and burial or cremation are both options. If the deceased is cremated, the ashes may be interred in a churchyard or cemetery or scattered in a designated area.
Hinduism	Cremation is the preferred method of disposal, as it is believed to release the soul from the body. The ashes are typically scattered in a sacred body of water, although they may also be interred in a sacred place such as a temple or home. Burial may also be practiced in some Hindu communities.
Islam	Burial is the preferred method of interment, and cremation is generally forbidden. The deceased are typically washed and wrapped in a shroud before burial, and the burial should take place as soon as possible after death, ideally within 24 hours. The gravesite should be oriented towards Mecca, and markers or headstones should be simple and unadorned.
Judaism	Burial is the preferred method of interment, and cremation is generally forbidden. The deceased is typically washed and wrapped in a shroud before burial, and the burial should take place as soon as possible after death, ideally within 24 hours. The gravesite should be marked with a simple stone marker, and the deceased should be buried in a plain wooden casket. The gravesite should not be disturbed or adorned with flowers or other decorations.
Sikhism	Cremation is the preferred method of disposal, but burial may also be practiced. If the remains are cremated, the ashes should be scattered in a natural body of water or interred in a sacred place such as a Gurdwara or home. If the remains are

	buried, the gravesite should be simple and unadorned, with no markers or headstones.
Humanism	Funerals and memorial services can take a variety of forms, but typically do not involve religious rituals or prayers. Burial or cremation may be practiced, and the focus is often on celebrating the life of the deceased and honouring their memory. The deceased may be buried in a natural or woodland burial ground, or their ashes may be scattered in

## Appendix 2: Environment Agency Good Practice

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### Measure 1

You should not carry out any human burials within:

- a [groundwater source protection zone 1](#) (SPZ1)
- 10 metres of the nearest field drain
- 30 metres from the nearest spring or watercourse
- 250 metres of any well, spring or borehole where the water is intended for human consumption or used in food production
- areas identified as having karstic groundwater flow characteristics – these areas are highly vulnerable to pollution because groundwater can flow quickly through the many fissures and fractures in the rocks

Field drains can mean:

- a ditch or open land drain that receives surface water run-off from surrounding land
- buried pipes or gravel-filled channels which are used to drain surface water from fields by gravity

### Measure 2

You should not carry out any human burials on land which is liable to flooding.

### Measure 3

You should make the base of each grave at least 1 metre above the highest anticipated annual groundwater level.

### Measure 4

You should not dig graves in unaltered or unweathered bedrock. This is solid rock which:

- can be buried or exposed at the earth's surface
- has not been altered by physical or chemical reactions (or both) such as exposure to the weather

### New cemeteries: permitting requirements

A new cemetery is defined as either:

- a cemetery development requiring planning permission under section 57 of the Town and Country Planning Act 1990 which was granted on or after 2 October 2023
- an extension to a cemetery requiring planning permission under section 57 of the Town and Country Planning Act 1990 which was granted on or after 2 October 2023

New cemetery developments must do one of the following:

- meet all the criteria in the exemptions for low environmental risk cemeteries
- operate under a standard rules permit
- operate under a bespoke permit



## **Exemptions for low environmental risk cemeteries**

New cemetery developments, or new extensions of a cemetery, do not need an environmental permit if they meet all the criteria in the [exemptions for low environmental risk cemeteries](#). The exemptions are set out in [The Environmental Permitting \(England and Wales\) \(Amendment\) \(England\) Regulations 2023](#), and will be consolidated into [The Environmental Permitting \(England and Wales\) Regulations 2016](#).

## **Standard rules permits for medium risk cemeteries**

Standard rules permits are suitable for activities where:

- the generic risks are well understood and mitigated
- a site specific risk assessment is not necessary because of this

Most medium risk cemetery developments are likely to be eligible for standard rules permits. For example, when burial rates are greater than those described in the exemptions.

The Environment Agency will soon consult on standard rules permits for cemeteries developments. They aim to make this option available to cemetery operators after the response to the consultation.

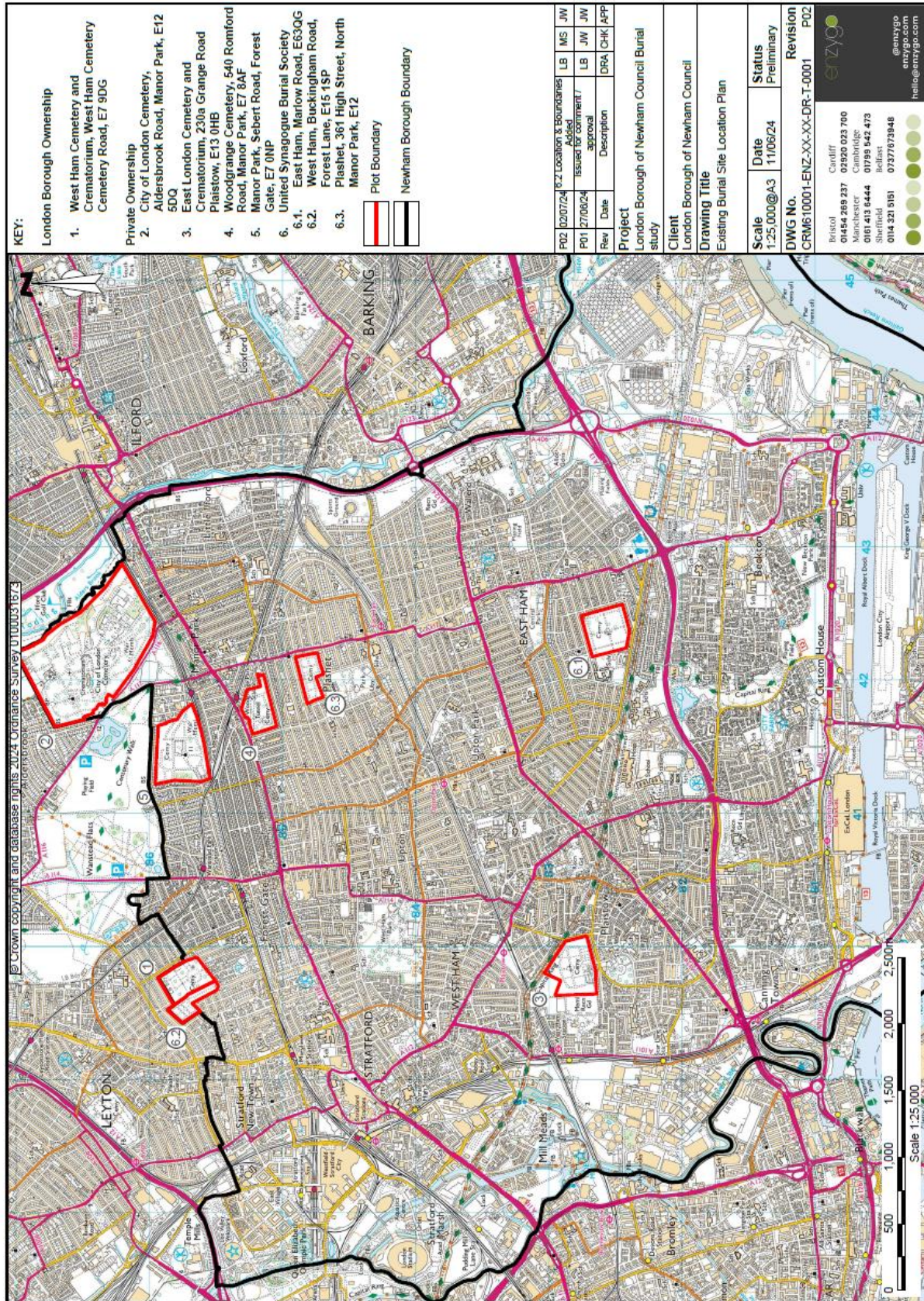
## **Bespoke permits**

You must apply for a bespoke permit if your new cemetery:

- cannot meet all the conditions in the exemption criteria
- cannot meet the conditions in a standard rules permit, when they are available

Source: [Protecting groundwater from human burials - GOV.UK \(www.gov.uk\)](#)

## Appendix 3: Existing Cemeteries within Newham



## Appendix 4: Technical Matrix Templates

### Ecological Matrix

Site Considerations	Beneficial	Neutral	Adverse
Statutory sites designated or classified under international conventions or European legislation.			
Statutory sites designated under national legislation (& Impact Risk Zones)			
Local Nature Reserves			
Other locally designated wildlife sites			
England HPI, Local BAP Habitats, Ancient Woodland, Important Hedgerows, Veteran Trees, TPOs and Conservation Areas			
Green/Blue & Aquatic Infrastructure, Dark Zones, and Local Policy			
Habitat Types			
Legally Protected & Priority Species <sup>15</sup> (& Consultation Zones where applicable)			

<sup>15</sup> Such as Bats, Badgers, Dormouse, Otter and Water Vole, Other Protected Mammals, Specially Protected Birds, Breeding, Wintering and Migratory Birds, Common Reptiles, Great Crested Newts, Other Protected Herpetofauna, Protected Fish/Marine, White-clawed Crayfish, Protected Invertebrates, Protected Flora, Invasive Flora, Invasive Fauna, Priority Species.

### Hydrology Matrix

Site Considerations	Beneficial	Neutral	Adverse
<b>Water Environment-</b> Groundwater Source Protection Zone (SPZ) <sup>1</sup>			
<b>Water Environment-</b> Groundwater abstraction/wells/springs supplying water for human use.			
<b>Water Environment-</b> Soil/Superficial Deposit thickness=>1.8m to give =>1m cover over coffin/body Graves should not be dug in bedrock.			
<b>Groundwater Table:</b> => 1 metre clearance between the base of the grave and the top of the water table – they shouldn't have any standing water in them when dug [water table depth should be =>2.8m			
<b>Water Environment:</b> Surface water The site is at least 30m from any spring or watercourse not used for human consumption.			
<b>Water Environment:</b> Off site or perimeter ditch drainage: Burial sites should be at least 10 metres from any field drain, including dry ditches			
<b>Water Environment –</b> Field/ditch drainage			
<b>Water Environment -</b> Highway drainage			
<b>Flood risk –</b> Fluvial			
<b>Flood risk -</b> Surface Water			
<b>Flood risk -</b> Tidal			
<b>Flood risk -</b> Groundwater			
<b>Flood risk -</b> Infrastructure Failure			
<b>Flood risk -</b> Site Drainage			

### Landscape Matrix

Site Considerations	Beneficial	Neutral	Adverse
<b>Landscape</b> Is the site within a 'valued landscape' <sup>16</sup>			
<b>Landscape/townscape Effects</b> Impact on pattern/density, tranquillity, culture and landcover/layout.			
<b>Arboricultural impacts</b> Assessment of trees/shrubs/hedges within the site, and their quality. Consider Tree Root Protection Areas.			
<b>Visual Effects</b> Visual impacts on sensitive receptors within 1km of the site.			

### Highways Matrix

Site Considerations	Beneficial	Neutral	Adverse
<b>Access</b> Existing access into the site and the suitability of this.			
<b>Highway Safety</b> Speed limit, parking on-street, lighting, pavement to site frontage, crash map data.			
<b>Sustainability</b> Regularity of bus/train service, cycle routes and footpaths.			
<b>Highways</b> Potential for significant highways impacts associated with development.			

<sup>16</sup> Such as Area of Outstanding Beauty, National Park, Special Landscape Area, Area of Great Landscape Value.

**Planning Matrix**

Site Considerations	Beneficial	Neutral	Adverse
<b>Access</b> Existing access into the site and the suitability of this.			
<b>Local Plan Allocation</b>			
<b>SHLAA</b>			

## Appendix 5: Calculation for Estimating the Number of Daily Funerals

The number of funerals conducted in a borough each day varies widely based on several factors, including the population size, demographic characteristics, and overall mortality rate of the area. There is a generally accepted formula to help estimate the number of funerals:

- **Population Size**
- **Mortality Rate:** This rate is usually expressed per 1,000 people. In many developed countries, the crude death rate ranges from 7 to 10 deaths per 1,000 people per year.
- **Demographic Factors:** The age distribution, health conditions, and other demographic factors influence the death rate.

To provide a rough estimate:

1. **Calculate Annual Deaths:**

$$\text{Annual Deaths} = \text{Population} \times \left( \frac{\text{Mortality Rate}}{1,000} \right)$$

2. **Convert Annual Deaths to Daily Deaths:**

$$\text{Daily Deaths} = \frac{\text{Annual Deaths}}{365}$$

3. **Consider Funeral Practices:** Not every death results in a funeral immediately, and cultural practices can affect the timing and number of burials.

Within London Borough of Newham the population in 2021 was 351,256 and a crude death rate of 8 per 1,000 people per year provides approximately 2,800 deaths per year. Using the calculation above means that there would be approximately 7 to 8 funerals carried out each day across the Borough.

These numbers are approximate and actual figures can vary year on year so for precise data, contact should be made with the Department of Health the LBN Registrar for more accurate records.

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To provide a rough estimate:

4. **Calculate Annual Deaths:**

$$\text{Annual Deaths} = \text{Population} \times \left( \frac{\text{Mortality Rate}}{1,000} \right)$$

5. **Convert Annual Deaths to Daily Deaths:**

$$\text{Daily Deaths} = \frac{\text{Annual Deaths}}{365}$$

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## Appendix 6: Cumulative deaths in Newham

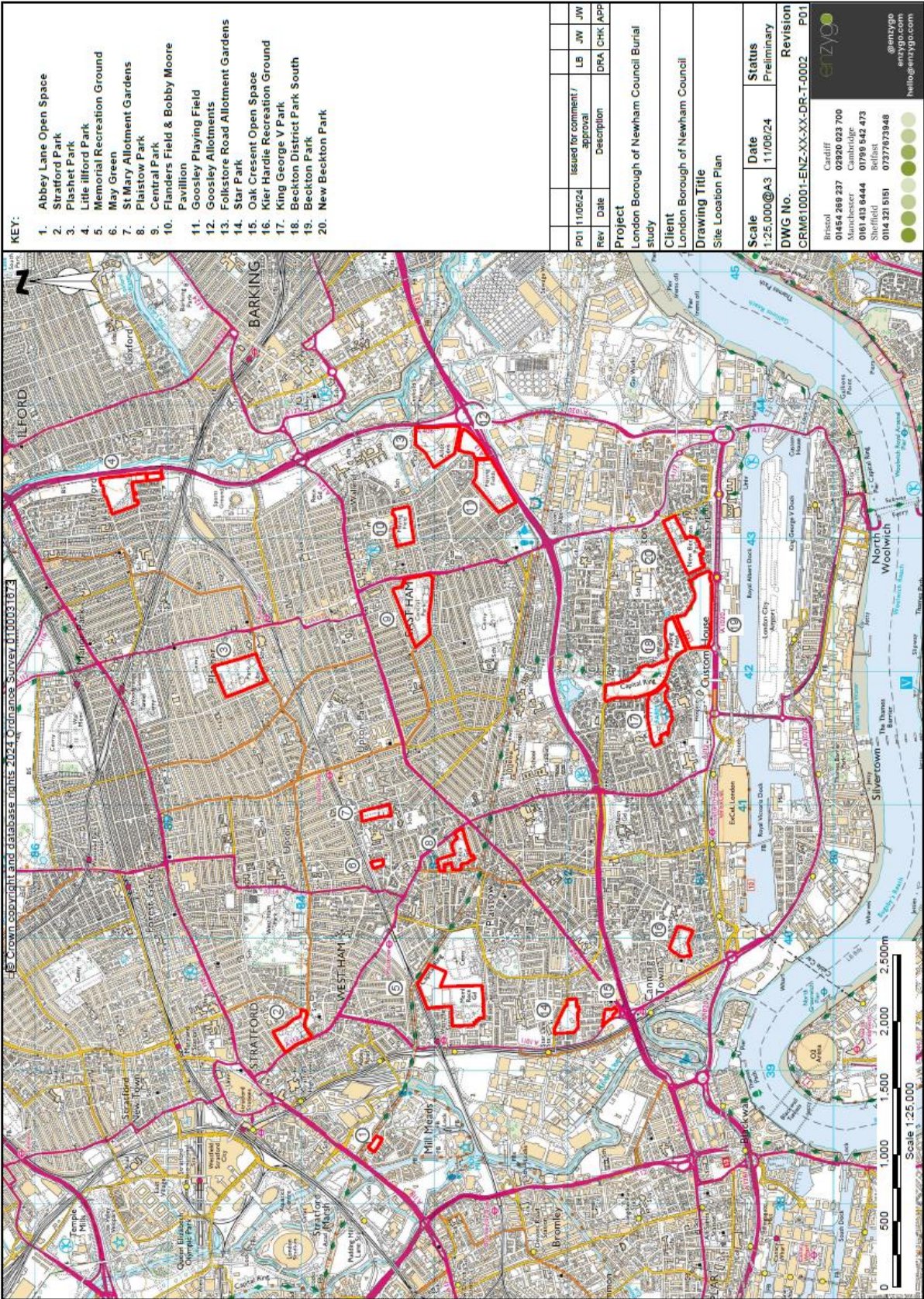
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Cumulative number of deaths in Newham	
2011	1201
2012	1295
2013	1280
2014	1193
2015	1382
2016	1294
2017	1242
2018	1425
2019	1312
2020	1684
2021	1799
2022	1329
2023	1364
2024	1402
2025	1437
2026	1466
2027	1518
2028	1553
2029	1595
2030	1636
2031	1679
2032	1728
2033	1768
2034	1808
2035	1860
2036	1908
2037	1954
2038	2000
2039	2046
2040	2040
2041	2041
	49239
	29804
	32803

## Appendix 7: LBN Operational Property

Site	Postcode/ nearest postcode	Conclusion	Planning policy
1. <a href="#">Abbey Lane Open Space</a>	E15 2RY	Flood zone 3	Too small
2. <a href="#">Stratford Park</a>	W Ham Ln, London E15 4PT	Good	Open space GSW1
3. <a href="#">Plashet Park</a>	325 Plashet Grove, London E7 8QR	Good	Open Space GSW1
4. <a href="#">Litle Ilford Park</a>	Church Rd, London E12 5NG	Good	Open Space GSW1 Metropolitan Open Land GSW1
5. <a href="#">Memorial Recreation Ground</a>	25 Ronald Ave, London E15 3AH	Flood zone 3	
6. <a href="#">May Green</a>	Watson St, London E13 0RZ	Good	Too small Open Space GSW1
7. <a href="#">St Mary Allotment Gardens</a>	Queen's Rd W, London E13 0PE	Good	Open Space GSW1
8. <a href="#">Plaistow Park</a>	Greengate St, London E13 0BD	Good	Open Space GSW1
9. <a href="#">Central Park</a>	Central Park Rd, London E6 3AB	Flood zone 2	
10. <a href="#">Flanders Field &amp; Bobby Moore Pavilion</a>	118 Napier Rd, London E6 2SG	Flood zone 3	
11. <a href="#">Goosley Playing Fields</a>	St. Albans Ave, London E6 6AJ	Flood zone 3	
12. <a href="#">Goosley Allotments</a>	51.525313, 0.070051	Flood zone 3	
13. <a href="#">Folkstore Road Allotment Gardens</a>	51.5269636779372, 0.07001714780087859	Flood zone 3	
14. <a href="#">Star Park</a>	Star Ln, London E16 4HW	Flood zone 3	
15. <a href="#">Oak Crescent Open Space</a>	300 Manor Rd, London E16 4PA	Flood zone 3	Too small
16. <a href="#">Kier Hardie Recreation Ground</a>	Tarling Rd, London E16 1LQ	Flood zone 3	
17. <a href="#">King George V Park</a>	Custom House, King George Ave, London E16 3HR	Flood zone 3	
18. <a href="#">Beckton District Park South</a>	Stansfield Rd, London E6 5LT	Flood zone 3	
19. <a href="#">Beckton Park</a>	London E6 5QJ	Flood zone 3	
20. <a href="#">New Beckton Park</a>	Savage Gardens, London E6 5NB	Flood zone 3	

# Appendix 8: Potential LBN owned Sites



**KEY:**

1. Abbey Lane Open Space
2. Stratford Park
3. Plashet Park
4. Little Ilford Park
5. Memorial Recreation Ground
6. May Green
7. St Mary Allotment Gardens
8. Plaistow Park
9. Central Park
10. Flanders Field & Bobby Moore Pavilion
11. Goosley Playing Field
12. Goosley Allotments
13. Folkstone Road Allotment Gardens
14. Star Park
15. Oak Crescent Open Space
16. Kier Hardie Recreation Ground
17. King George V Park
18. Beckton District Park South
19. Beckton Park
20. New Beckton Park

Rev	Date	Description	DRA	CHK	APP
P01	11/06/24	Issued for comment/ approval	LB	JW	JW

**Project**  
London Borough of Newham Council Burial study

**Client**  
London Borough of Newham Council

**Drawing Title**  
Site Location Plan

Scale	Date	Status	Revision
1:25,000@A3	11/06/24	Preliminary	P01

**DWG No.**  
CRM10001-ENZ-XX-DR-T-0002

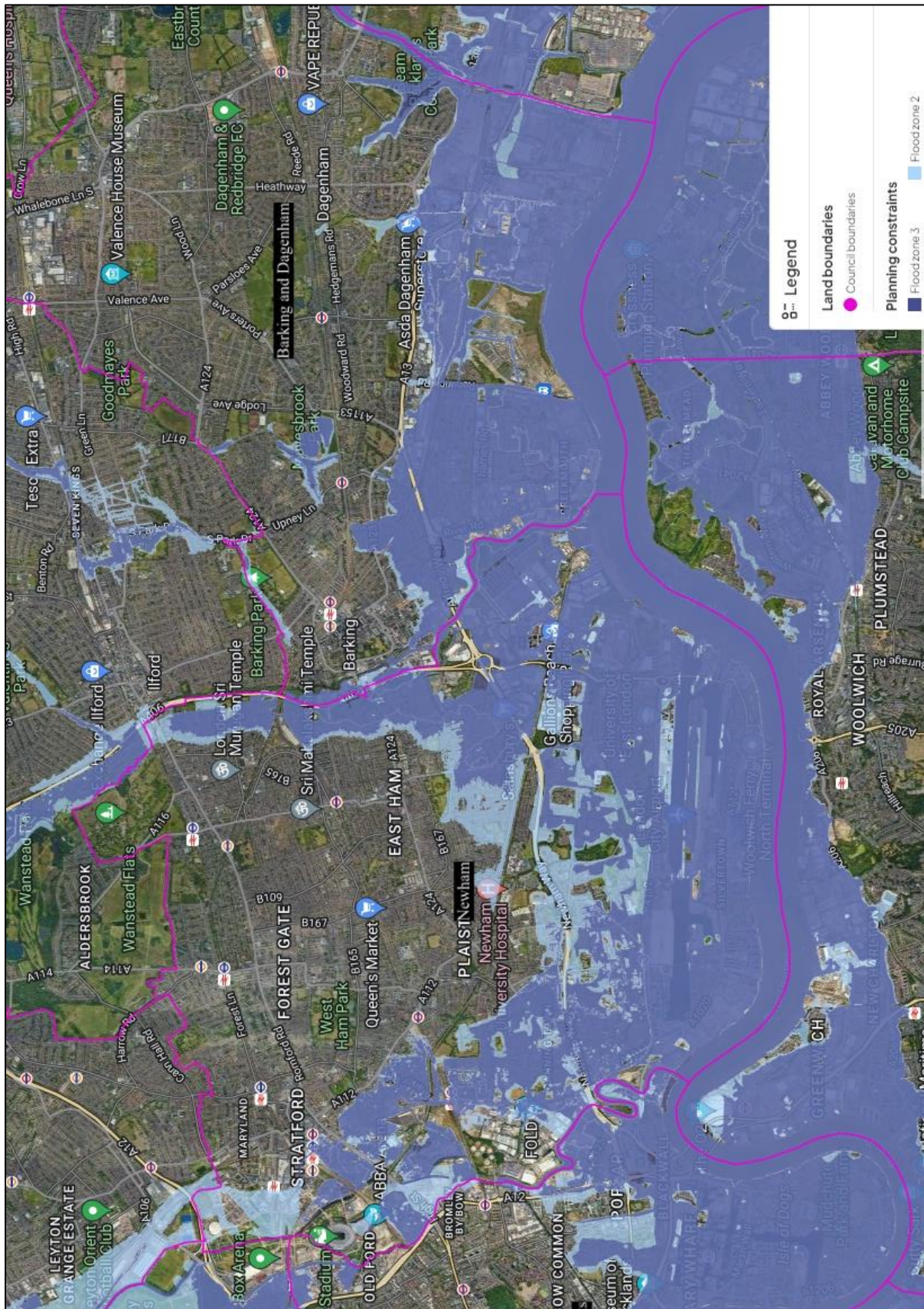
**enzygo**  
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Cardiff 02920 023 700  
Manchester 0161 413 6444  
Cambridge 01798 542 473  
Sheffield 0114 321 5151  
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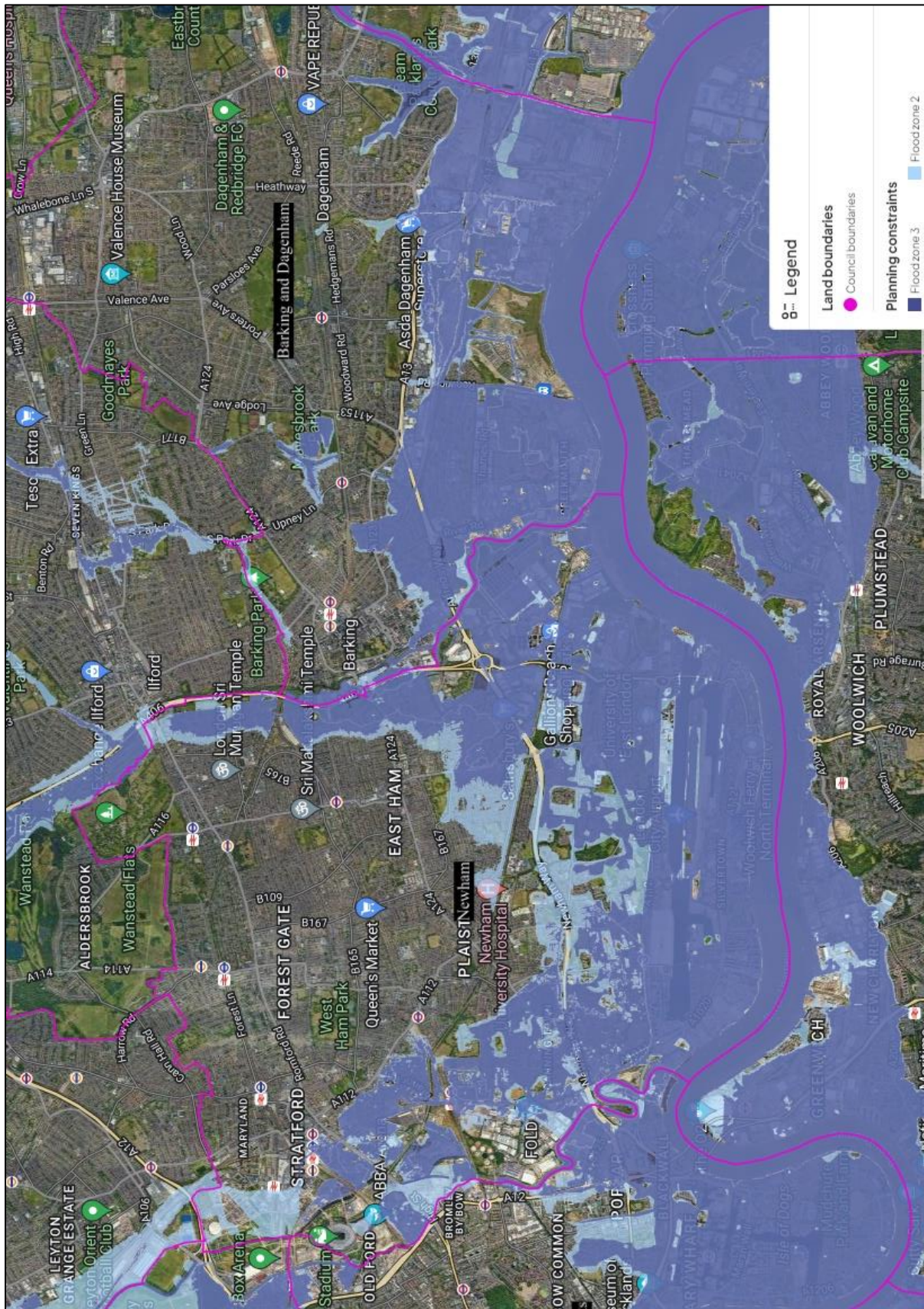
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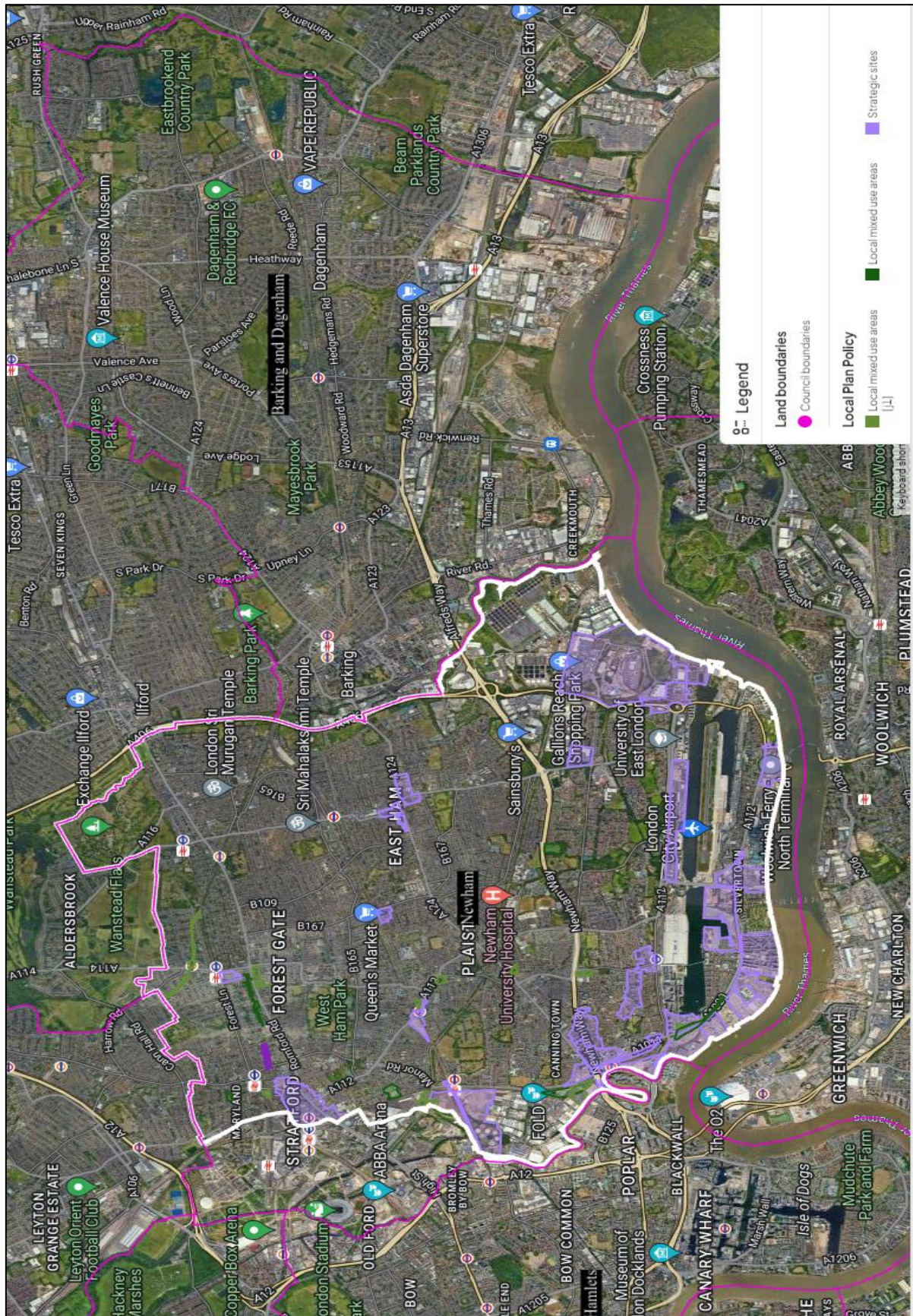
### Appendix 10: Flood Zone 2 & 3



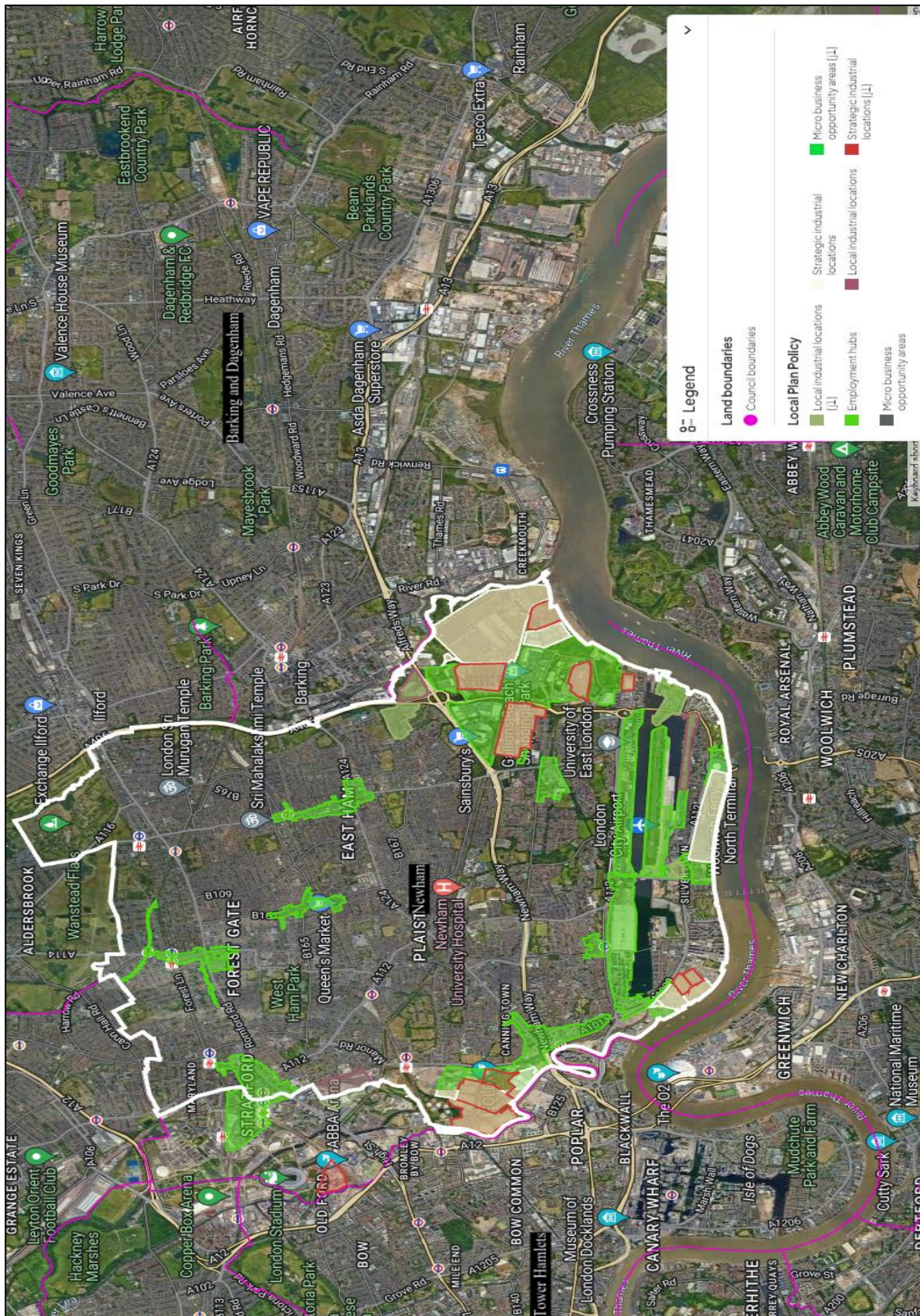
Appendix 11: SPZs



## Appendix 12: Housing and Mixed use Allocations

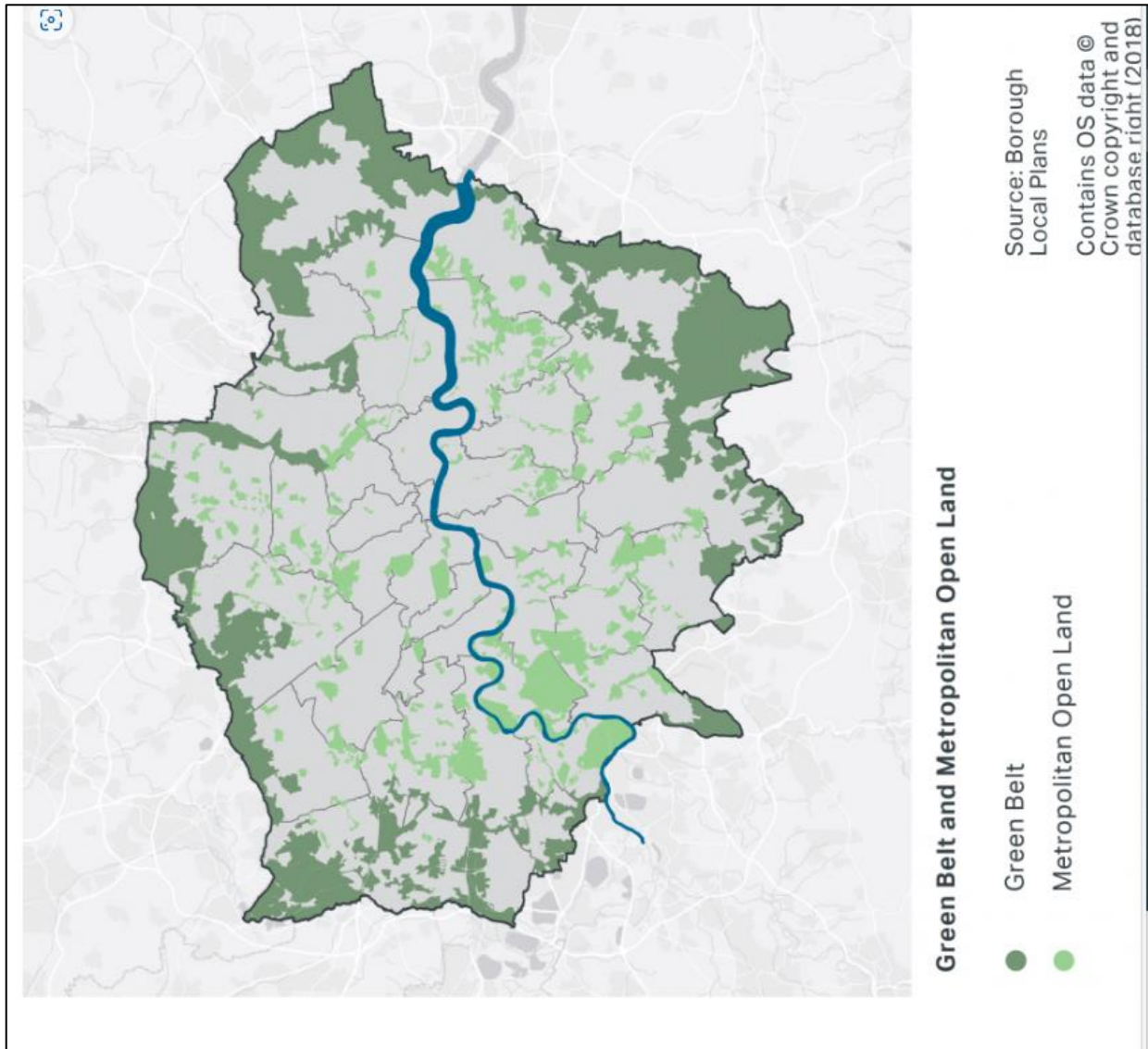


## Appendix 13: Employment Allocations

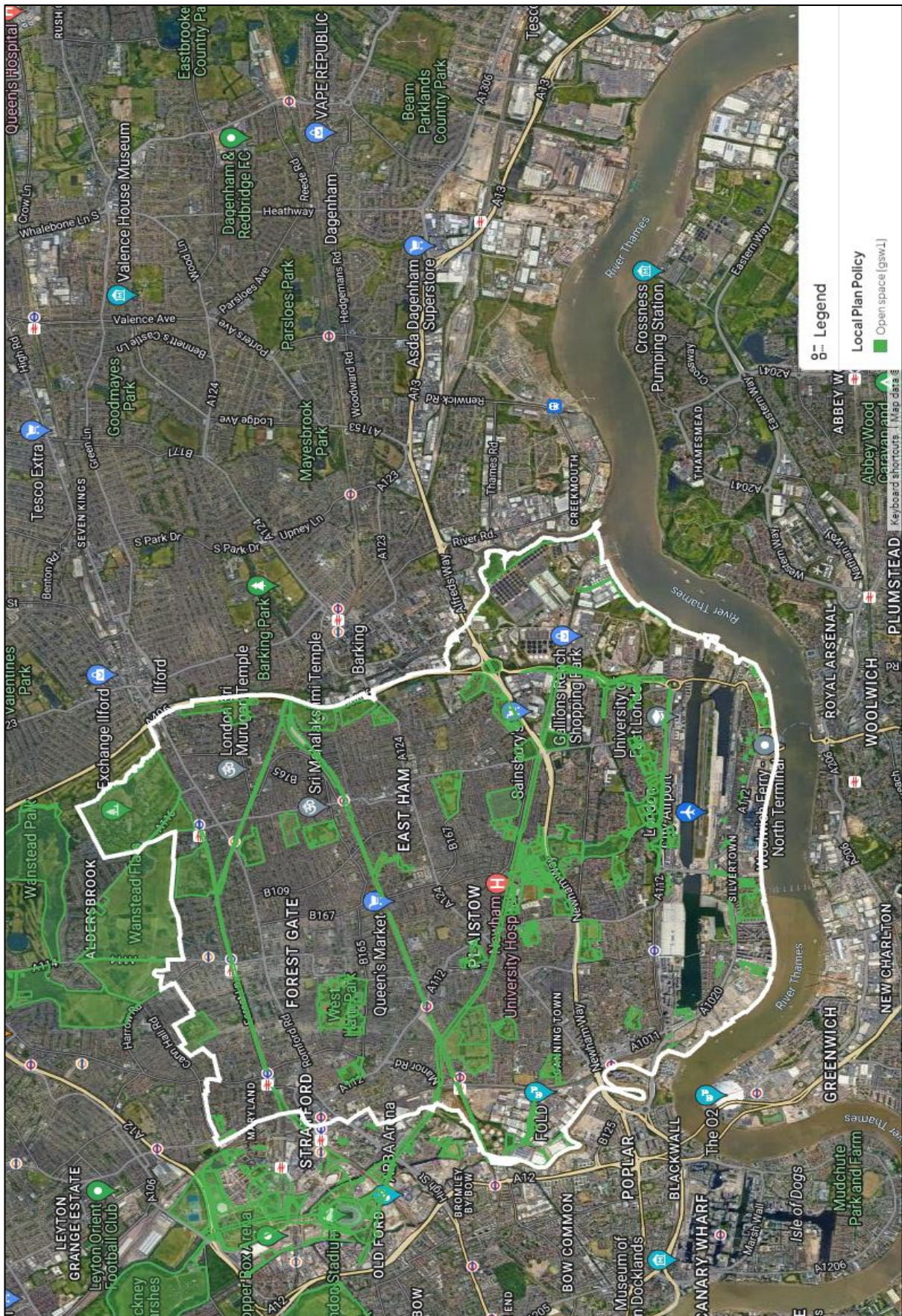




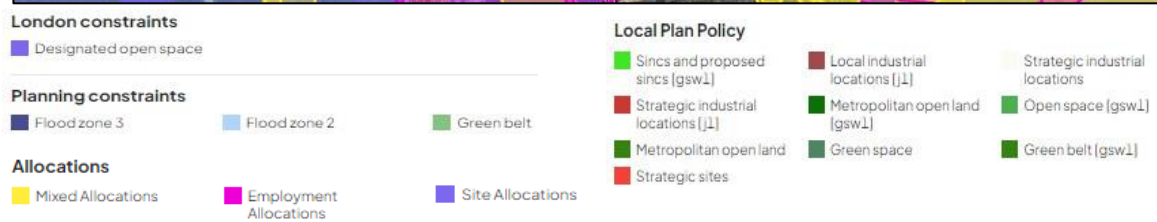
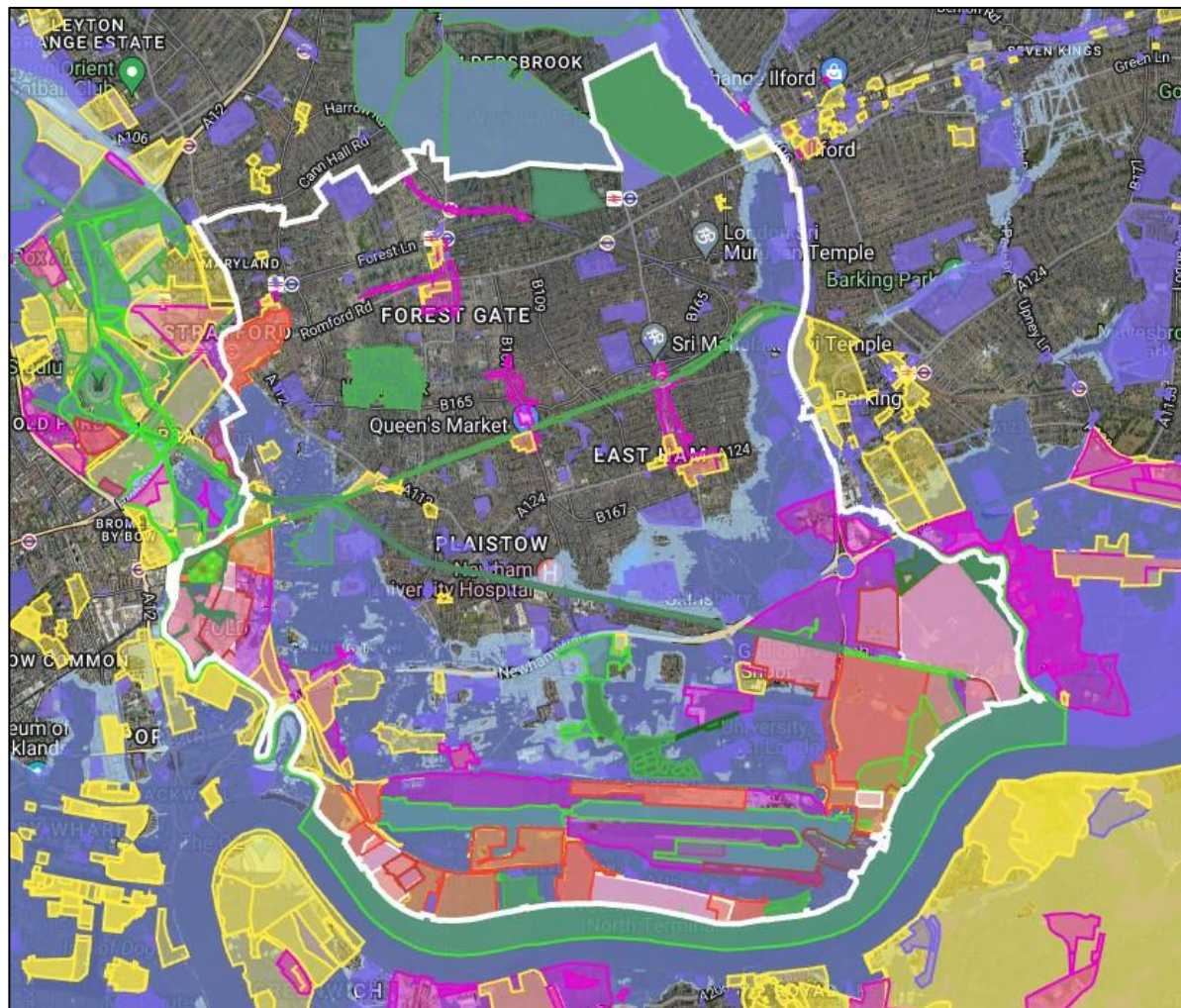
## Appendix 14: Green Belt and MOL



Appendix 15: Open Space



## Appendix 16: Allocations & Designations





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**SHEFFIELD**

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Stocksbridge  
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Ducie House  
Ducie Street  
Manchester  
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Tel: 0161 413 6444

**CARDIFF**

Regus House  
Malthouse Avenue  
Cardiff Gate Buisness Park  
CF23 8RU  
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