

Peter Mitchell Associates comments

Gardens of Peace Muslim Cemetery (mohamed.omer@gardens-of-peace.org.uk)

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The Gardens of Peace welcome the Mayor of London's new draft London Plan, published in December 2017 and the opportunity to offer comments upon it.

We are pleased to see the importance given to the protection of cemeteries.

We understand the challenges surrounding the provision of new burial space within London. We also understand the opportunities that the re-use of burial space can offer to enable the continued provision of local burial space and the sustainability of cemeteries.

The re-use of graves requires sensitivity to the feelings of living relatives and we are aware that this is recognised to an extent within current legislation, which requires public notice of intentions to extinguish exclusive rights of burial and to re-use graves and provides rights of objection.

Re-use also requires sensitivity to religious beliefs and we note the undertaking to consult faith groups that Parliament required in approving the New Southgate Cemetery Act 2017. Objections based upon religious belief to the re-use of graves are likely to be held by people of various faith groups into the long term. Whilst he supports the re-use of graves, we encourage the Mayor to recognise the need for greater sensitivity to the religious beliefs held by Londoners and to support greater clarity in the legislation applicable to optimising burial space, particularly through the re-use of graves.

We are very pleased to note the Mayor's view that burial provision in London requires a strategic approach and that Development Plans should recognise the need to plan for the different requirements of different communities.

We are also pleased to note the Mayor's encouragement to boroughs to support development proposals for new cemeteries. It is our experience that boroughs place little importance upon the need for new burial provision, particularly if they perceive that is likely to meet the needs of communities outside of their own borough boundaries.

The shortage of burial space is a national issue, with planning legislation and its interpretation hindering the development of new cemeteries. We urge the Mayor to support a review of existing planning restrictions on cemetery development.

We are especially pleased to note that the Mayor recognises that the proximity principle, whilst very important, cannot always apply to the provision of burial space that meets the needs of different communities.

Previously, we were somewhat dismayed to note that the proximity principle, referred to in Policy 7.23 of the previous London Plan, was reinterpreted by the subsequent Social Infrastructure Supplementary Planning Guidance published in May 2015. In section 8 'Burial Needs', the SPG states:

"London Plan Policy 7.23 encourages local authorities to provide burial space in close proximity to their residents ...".

In introducing the word 'close' in reference to proximity, the Supplementary Planning Guidance seems to suggest degrees of proximity and a requirement for burial space provision to be restricted to 'close proximity', which was not explicit in Policy 7.23.

Paragraph 5.7.1 in the new London Plan recognises that

"... there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough. This may require a sub-regional approach to the provision of burial space".

We would therefore request that the more realistic meaning of proximity as stated in paragraph 5.7.1 of the new Draft London Plan is not restricted by any subsequent Supplementary Planning Guidance.

Cross-borough and sub-regional working is notable by its absence with regard to burial space provision. Some boroughs are content to provide burial space, regardless of whether it meets the needs of different communities. The Mayor makes it clear that boroughs need to take a more strategic approach to burial provision than they have to date.

We are pleased to note that the Mayor recognises that overcoming the challenges of identifying suitable sites for new cemeteries may require their development in Green Belt or Metropolitan Open Land. We appreciate the importance of such designations and the need to preserve the openness and the purposes of the designations. We believe that the way we design and manage our cemeteries, including the simplicity of small tablet memorials, fits in with land under these designations.

We seek to create cemeteries that have a minimum negative impact upon the environment. Whilst we appreciate the potential benefits they offer to people and the environment, we do not regard woodland or parkland burial as being compatible with Islamic requirements. Our cemeteries enhance the environment through planting schemes including many trees. Our cemeteries are a distinct form of Natural Burial. We do not embalm our dead or bury them in polythene-lined coffins that have caused pollution during their manufacture and transport and will pollute the earth. We bury our dead simply wrapped in cotton sheets, without other materials or grave goods and our memorials are uniformly small scale and modest. In these ways, our cemetery and burial practices embody our religious beliefs.

Islam requires us to bury our dead. Whilst we appreciate the potential benefits of innovative approaches to providing places for ashes following cremation, these would not be relevant to us.