

NFCF CMA Funeral feedback 28th June 2018

The National Federation of Cemetery Friends (NFCF) was founded in 1986 as a network of local groups that were concerned about the decline in care of our historic cemeteries. The threat to these important burial grounds from developers and negligent owners and managers of the cemeteries was the motivation for conservationists and historians to make a positive and practical stand. Our membership approaches one hundred groups and affiliates, across Scotland, Wales and England, and we have links to the Association of Significant Cemeteries in Europe. Our familiarity with the cemetery users, owners and their practice means that we can call on a broad experience of cemetery operations.

We discussed your study at our national AGM earlier in June. We noted that your market study scope, on a footnote on page 3, proposes to exclude cemeteries. We received feedback from members questioning that decision.

Our response therefore looks to expand the scope of your study. Our members see links between the practices of cemeteries and crematoria and the effects of market competition.

Our members observe both local authority and private cemeteries in operation. Many new private burial grounds have been opened in recent years, many offering a so-called 'green' or 'woodland' setting. A number of major historic cemeteries remain in private hands. Local authorities have no legal obligation to provide burial facilities for their inhabitants, although historically it was a matter of civic pride for them, or their Burial Board predecessors, to do so.

Local authority burial grounds and crematoria still have a dominance in many areas, and they exert a strong influence on the funeral practices in that area. Their ability to offer a date for a burial or cremation service sets the pace, which must surely be reflected in funeral costs. But whereas a few decades ago it might take a few days to organise a service, today delays of several weeks are commonplace. Religious groups that seek a 24 hour turnaround have, in some instances, set up their own organisations to make up for this shortcoming. Others outside these groups have no option but to look inconveniently further afield or to bide their time. As a funeral is typically a 'distressed purchase' their grieving is led by this pace, and it is likely that costs are influenced by this.

If the funeral resulted in a burial or a cremation burial, the family will be at leisure to select and erect a suitable memorial, if required. Again, the burial ground curates this process; its 'churchyard rules' frequently dictate what form, colour, or material the memorial will take. (But note that churchyard rules were originally created to protect the setting of a historic parish church.) The family may later discover that their chosen memorial is unapproved, or needs a special approval process. If the remains

are already buried by then it is too late. The result is frequently a uniformity of design, selected for more the convenience of the cemetery managers, rather than for the individual. The innovation that can be seen in historic cemeteries is gone; would more flexibility or the reintroduction of alternative or new materials offer better value or consumer choice? Note that the British Institute of Industrial Design encouraged more innovation in memorials before WWII, with brick and ceramic designs.

We consider that the price of a family's memorial should not just be seen as a one-off cost. Historically some graves were leased 'in perpetuity'; nowadays the lease is typically for 25, 50 or 75 years. A memorial may have to remain in good condition for many years. The long term consequences of this change are unclear.

Long-term management policies of the cemetery can also lead to distress and financial loss. Family's historic monuments have been wilfully destroyed through clearances and plans for re-use. Our members have been concerned at the methods by which graves and their memorials can be damaged or rubbed out by the cemetery authority. Current safety concerns have too frequently led to memorials being marked or pushed over as part of a "topple test". Memorials are private property although the authority has an obligation to protect visitors to the site from dangerous memorials. However it has no obligation to put them right. The result can be cemeteries with many fallen memorials.

We have also been concerned to see this topple test, designed for a 1.2m high modern stone memorial, applied to other styles of monument where the risks are quite different. It seems that the regulations are applied to suit the authority, rather than other stakeholders. A recent case saw a child killed after playing on top of a tall Victorian monument: immediately afterwards the cemetery authority reacted by flattening some thousand memorials - possibly causing £½M of damage to the grave-owners property.

Families and visitors can be taken by surprise when they see a grave flattened with little or no warning. The families' distress is often heightened by guilt for not visiting regularly. These emotions can spill over as anger, even if basic grass cutting is neglected. Baroness Hussein-Ece spoke of this concern in the House of Lords on 18th June. There are few sanctions against poor standards of management.

Our members recognise that historic cemeteries are a valuable green space and provide a strong link to our local and national heritage. Will our regulations and modern practices provide historic cemeteries for the future?

Yours faithfully.

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