



ASSOCIATION OF PRIVATE CREMATORIA & CEMETERIES

Funerals Market Study
Competition and Markets Study
7th Floor,
Victoria House
37 Southampton Row
London
WC1B 4AD

28th June 2018

Dear Sir or Madam,

While the Association has not received any direct contact from you in relation to the Funeral Markets Study, we are fully aware of the intended scope and progression of the project and have already held initial conversations with the officers and some members of the Association. You are no doubt aware that there are 93 privately owned and operated crematoria in the UK, some 65% of whom are members of the Association and an encouraging membership drive is also now under way.

We would like to give the Authority whatever practical assistance and information we can provide throughout the project. To this end and as a first contribution, set out below are initial condensed responses to the questions set out in Paragraph 52.

o) Do crematoria compete to serve funeral directors and their customers and if so, how?

There is clear evidence of direct competition on price, for example, there are two crematoria in Brighton, one of which is privately operated and the other is run by the local authority and they have identical fees of £633.00*. There are also examples of cluster pricing, the County of Gloucestershire being an example where the fees for the three crematoria within the County range from £830.00 to £895.00*. Similarly in East Sussex which includes the two crematoria in Brighton, the fees for the four crematoria within the area range from £633.00 to £688.00*.

Secondly, there is competition in terms of the facilities available and the quality of service delivery. Although something of a generalisation, privately operated sites tend to have more extensive facilities in terms of, waiting rooms, areas for floral displays, amenities for the book of remembrance, memorialisation and memorial gardens. The private sector also seems to be gaining an advantage, particularly throughout the last 10 years, in terms of the availability and visibility of staff to assist mourners when they visit the crematorium, whether it be for a service or visit to the book of remembrance room or just to the memorial gardens.

p) Do customers (or funeral directors on their behalf) actively consider alternative crematoria when arranging a funeral? What would encourage them to do so more?

There will always be a proportion of bereaved families who will want to use the same crematorium as before. However, although quantified statistics are not available this would appear to be slowly reducing over time. The availability of the service chapel at the time and date the family want the funeral, is becoming increasingly important. As shown below the interval between the death and the funeral service has got longer partly because at least 80% of families want the service to take place broadly between the hours of 11.00am and 3.00pm.

The All Party Parliamentary Group (APPG) on Funerals and Bereavement conducted a comparative study of the lead time between the death and the funeral service. In 2003 this averaged out at between 9 and 10 days but by 2013 the interval on average was between 15 and 17 days. While there are multiple reasons for this change, such as, the time it takes for the necessary paperwork to be in place prior to registration of the death, particularly in relation to deaths that occur in hospitals and the fact that many families now wish to consult with their wider family and to accommodate them in terms of the date and time of the funeral. Therefore particularly at busy periods funeral directors will offer alternative crematoria to meet the family's requirements. Again, location and facilities may well affect the recommendations made. Most of the crematoria built since 1985, some 85% of which have been funded by the private sector, are set in rural or semi-rural tranquil locations, partly for reasons of long term viability. Such sites are increasingly attractive to mourners, a good example of this is in Ipswich Suffolk where the local authority facility conducted 893* Cremations in 2017 in comparison to a private facility that opened in near-by Nacton in 2010 where 1874* cremations were carried out in the same year.

q) What are the main barriers to entry for new crematoria?

The overriding barrier is the inconsistency of planning decisions both in terms of original applications and at appeal. This was highlighted to the then Department of Communities and Local Government – now the Ministry of Housing Communities and Local Government - when they conducted their consultation entitled “Review of Crematoria Provision and Facilities in 2016”. The most pressing need therefore is for a set of guidelines, preferably enforceable by statute, to be developed to achieve such consistency. The variations expressed particularly in relation to such issues as the accessibility of public transport, car parking capacity, the size and extent of the memorial gardens and the requirement for bike racks are simply vast.

r) Why have cremation fees generally increased and why do they differ across the UK?

A major reason for such increases is the investment required in the replacement and additional equipment, specifically the installation of mercury abatement filtration plant. In many cases the opportunity has been taken at the same time particularly but not exclusively by local authorities to upgrade and in some cases extend the public facilities offered as well as adapting the crematory for the new equipment where necessary.

Regional variations in fees occur for a whole variety of reasons but the variation in the facilities provided obviously impacts on both the overhead and operating costs. The private sector continues to invest in and expand the services offered, a good example being the provision of catering facilities.

In conclusion, we believe that the Association can provide more extensive information as required and trust therefore that we will be able to offer continuous support throughout the project.

* Source: Cremation Society of Great Britain.

Yours sincerely

Richard Barradell
Secretary and Treasurer
Association of Private Crematoria and Cemeteries