



ASSOCIATION OF PRIVATE CREMATORIA & CEMETERIES

Clerk to the Local Government and Regeneration Committee
Committee Office
Room T3, 40
Scottish Parliament
Edinburgh
EH99 1SP

Sent via Email to lgr.committee@scottish.parliament.uk

1st December 2015

Dear Sirs,

Ref: Call for Views – Burial and Cremation (Scotland) Bill
Submission to The Local Government and Regeneration Committee

The Association of Private Crematoria & Cemeteries (APCC) is grateful for the opportunity to comment on the particularly aspects specified in the Burial and Cremation (Scotland) Bill and we set out our comments below.

1. Whether proposals for the restoration of lairs are appropriate (sections 25-37)?

The APCC supports the proposals for the reuse of lairs but recommends that a specific requirement be included to the effect that all relevant legislation and guidance in relation to grave safety be complied with, prior to commencing the reuse process.

2. Whether provisions on the reuse of headstones would be appropriate?

Overall, APCC believes that, ultimately, the policy in relation to the reuse of headstones is a matter for individual members. However, where such reuse is considered, two principles should be adhered to, namely that the grave owner(s) and/or their successors as appropriate give permission for such reuse, while the cemetery concerned has the responsibility for deciding on all aspects of feasibility for such reuse.

3. The appropriateness and extent of the roles which should be undertaken by inspectors of burial, crematorium and funeral directors (primarily Part 4)?

In overall terms, APCC supports these proposals but trusts that the criteria and content of such inspections and the parameters of inspectors' authority will be developed in close consultation with the associations representing burial, cremation and funeral directors' interests. It is

fundamentally important that inspectors' powers recognise the highest practical quality level that can be delivered in each major aspect of each service.

4. The appropriateness and extent of the proposed regulation of funeral directors (primarily Part 5)?

Again, APCC is in favour of the practical regulation of funeral directors but the comments made in Point 3 above apply equally here.

5. The extent to which the Bill will address funeral costs and what, if any further measures the Bill could contain?

It is not appropriate for APCC to comment on the overall cost of funerals. However, it should be noted that members are actively encouraged to give a detailed breakdown of burial fees and cremation costs both in their printed material and on their individual crematorium websites.

6. The appropriateness of the removal of existing provisions restricting the proximity of new crematorium to housing?

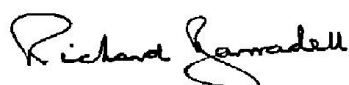
While accepting that specific legal wording in relation to the 200 yard rule might require modernisation when being embodied in new legislation, APCC not only robustly supports its retention but believe it should be extended to encompass commercial, industrial and any other developments which have the potential to increase noise levels within the vicinity of any proposed crematorium site. APCC also emphatically endorses the view already expressed by others, whereby once a crematorium is established, other developments, as defined immediately above, should not be allowed within the 200 yard boundary of the crematorium.

The overriding principle employed by our members when operating, modernising or developing a new crematorium is to ensure that they create as tranquil an environment as possible for the benefit of the bereaved whose needs, in terms of both celebrating and remembering a life, are much better understood than they were when the vast majority of crematoria were built in the 1950's and 60's. These needs are evidenced by extended facilities, such as larger waiting areas, specific areas for the display of floral arrangements and Books of Remembrance. Also, there is an indisputable growth in the demand for a much wider range of tasteful memorialisation resulting in the need for more extensive Gardens of Remembrance. All these needs cumulate in an absolute requirement for the developer of a new cremation facility to ensure that a serene culture exists throughout the whole site.

Any relaxation of the 200 yard rule runs the very real risk of removing the right of the bereaved to both celebrate a life at the funeral ceremony and to be able to remember and reflect on that life in the longer term.

Hopefully, the above comments will contribute to the refinement and operation of the legislation but please do contact the undersigned via any of the contact methods shown below.

Yours sincerely,



Richard Barradell
Secretary/Treasurer