



Mill Hill House, Church Lane, Wickham Skeith,  
Suffolk IP23 8NA

13<sup>th</sup> December 2021

Consultation on Amendments to the Environmental Permitting  
(England and Wales) Regulations 2016  
Consultation Coordinator, 2nd Floor, Foss House  
Kings Pool, 1-2 Peasholme Green  
York  
YO17 PX16

VIA EMAIL

Ref: Environmental Permitting (England and Wales) Regulations 2016

Stradbroke Parish Council is a burial authority and is responsible for Stradbroke Cemetery, Laxfield Road, Stradbroke IP21 5JT

The Parish Council is concerned about the draft recommended amendments to the Environmental Permitting (England & Wales) 2016 Regulations; in particular the recommendations included in **Annex B** – DRAFT Exemption conditions for small-scale cemetery development in low environment risk settings.

Taking the proposals in order of the published document.

Existing operational cemetery:

**1. A burial within a cemetery must not cause pollution of surface water or groundwater.**

This cemetery is in a low lying area therefore double depth graves are not permitted to avoid pollution.

**2. A burial within a cemetery must not be within 10 metres of any field drain, including any dry ditch.**

This may mean that the area available for future burials is severely limited; the cemetery is approximately 66m wide and approximately 152m in length. The cemetery is surrounded on 3 sides by field ditches therefore a large area of the cemetery would become unusable. Given that the cemetery has filled from the road (non-ditch) side first, this recommendation would severely limit the number of spaces remaining, currently the graves nearest to the ditches are at 6m.

- 3. A grave must have at least 1 metre clearance between the base of the grave and the top of the water table and must not have any standing water in it when dug.**

Graves are dug to the minimum depth permitted to ensure they are as far from the water table as possible with enough clearance for sufficient soil to be added to adequately cover the grave. This is already standard procedure.

- 4. A burial must not be undertaken directly into groundwater.**

See Question 3.

- 5. A grave must not be dug in unaltered or unweathered bedrock.**

See Question 3.

- 6. A grave must not be dug in an area susceptible to groundwater flooding.**

See Question 3.

- 7. A grave must be deep enough so at least 1 meter of soil will cover any part of the coffin or body.**

This is already good practice.

- 8. A grave plot must not be less than 5m<sup>2</sup> in area.**

Currently grave plots in the cemetery are approximately 3m<sup>2</sup> in area. As double depth graves are not permitted, there are many plots that have already been purchased and an exclusive right of burial certificate issued, in particular to bereaved spouses to enable them to be buried beside their wife or husband. It is not clear from the proposals whether the requirement for a 5m<sup>2</sup> grave area will be applied retrospectively to already reserved plots.

Should these amendments be adopted, the number of available plots will be significantly reduced and therefore a further cemetery would be required in the parish much sooner than has been planned. In fact, the suggested increase in grave area combined with the distance from a dry ditch would mean that the 257 plots presently available would become 70. Should the new guidelines be imposed on all new interments and no allowance made for plots purchased prior to any change, then the 50 reserved plots, which would not be big enough to comply with amended regulations, would have to be reallocated elsewhere in the cemetery, leaving only 20 plots available.

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