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A Risk and Options Appraisal Report for a New Cemetery.

Redditch Borough Council

Date: February 2025

The CDS Group, Building 51, Wrest Park, Silsoe, Bedfordshire, MK45 4HS
W: www.thecdsgroup.co.uk
T: 01525 864387



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1 Introduction

- 1 The purpose of this report is to review the risk analysis of two options for the future burial provision for Redditch Borough Council.
- 2 The Bromsgrove and Redditch area is reaching a capacity for new burial space, furthermore, as stated in the Redditch Local Plan, 1.7 hectares of land is required for burial provision¹.

1.1 Options

- 3 There are two potential options this report will consider for Redditch Borough Council. These options include:
 - **Option 1** - Repurpose an area of existing ashes scattering ground at Abbey Cemetery, B97 6RR.
 - **Option 2** – Next Steps for the proposed site 2B: Land North of Morrisons and West of the B4497, B98 0JD. (South of Arrow Valley Country Park).
- 4 Both options will be assessed against burial information across the Bromsgrove and Redditch area, with local policy in mind. Furthermore, the risk for each option will be assessed using Risk Register analysis. Figure 1 shows the location of both Option 1 at Abbey Cemetery, B97 6RR and Option 2 (Proposed Site 2B) at Land North of Morrisons and West of the B4497, B98 0JD.

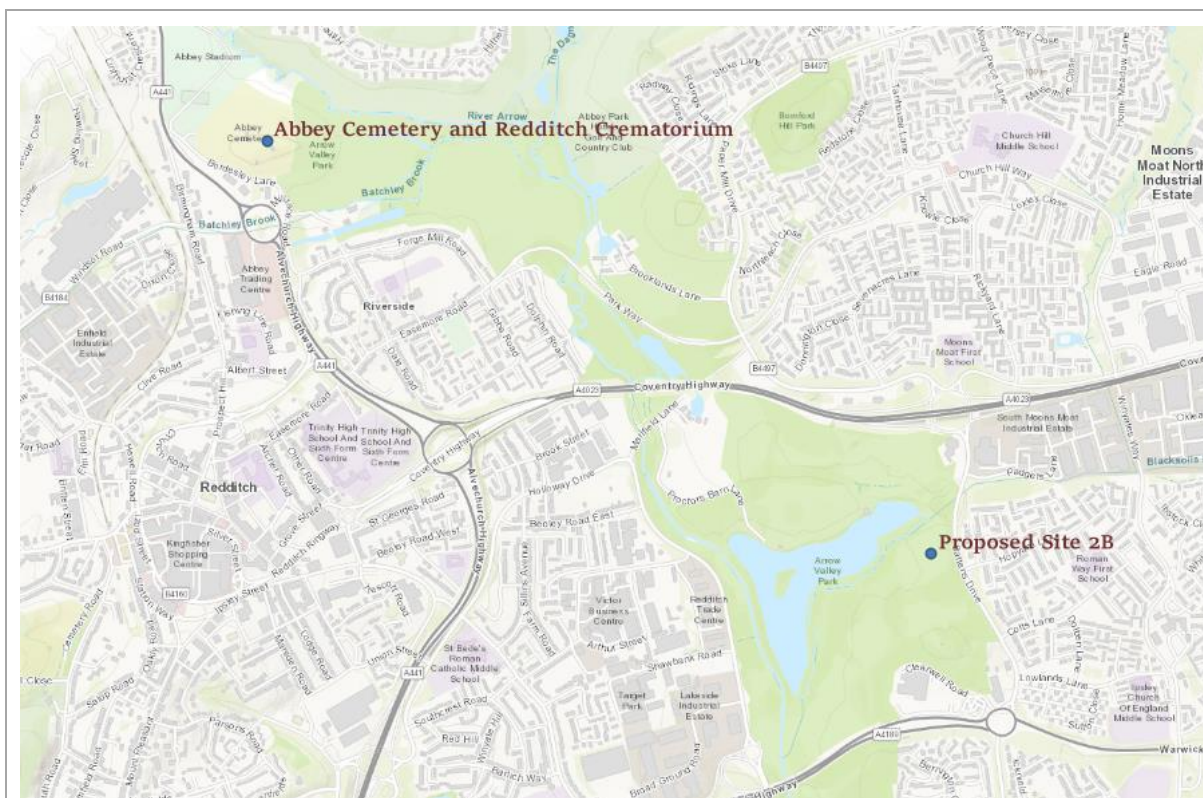


Figure 1. The Location of Option 1 (Abbey Cemetery) and Option 2 (Proposed Cemetery) Within the Redditch Area.

¹ Redditch Borough Council (2017). Available from: [Adopted Borough Of Redditch Local Plan No4 2011 2030](#)

2 Background

2.1 Population Demographics

- 5 The number of individuals living across Bromsgrove and Redditch has shown to have increased (Redditch by 3.4%² and Bromsgrove by 5.9%³) between the 2011 and 2021 Census. Additionally, both areas have been projected a growing and also aging population between 2018 and 2040, this has been presented in Table 1.
- 6 Both an increasing and aging population will produce a strain on current burial provision in the area.

Table 1. Population Projections and Aging Population of Bromsgrove and Redditch (2018-2040).

	2018	2040
Bromsgrove All Persons	98,662	115,103
Bromsgrove 65+	22,168	29,827
% 65+ within Whole Population of Bromsgrove	22.47%	25.91%
Redditch All Persons	84,989	85,819
Redditch 65+	15,450	19,147
% 65+ within Whole Population of Redditch	18.18%	22.31%

2.1.1 Muslim Population

- 7 The percentage of individuals practicing the Muslim faith has been presented in Table 2. This has been accounted for within demographic analysis as all Muslim deaths result in burials, therefore it is important that there is burial space accounting for this religious requirement. Table 2 demonstrates that the Muslim population is increasing across the Bromsgrove and Redditch areas as well as more broadly across the West Midlands.

Table 2. Muslim Individuals Across Bromsgrove and Redditch (2011-2021).

	2011	2021
Bromsgrove Muslim Population %	0.5	0.9
Redditch Muslim Population %	3.4	4.2
West Midlands Muslim Population %	6.7	9.6

2.2 Existing Cemeteries

- 8 The burial numbers from the last five years have been presented in Table 3. The average number of multi-faith new coffin graves (burials) from 2020 to 2024 has been calculated as 71 per annum. This equates to approximately 1-2 burials per week.

² ONS (2023). Available from: [How life has changed in Redditch: Census 2021](#)

³ ONS (2023). Available from: [How life has changed in Bromsgrove: Census 2021](#)

Table 3. Burials Per Annum Across the Bromsgrove and Redditch Area (2020-2024).

Year	2020	2021	2022	2023	2024
New Coffin Grave (Multi-faith)	77	86	61	70	65
Reopen Coffin Burial (Multi-faith)	69	64	65	70	60
New Coffin Grave (Muslim faith)	17	9	8	12	13
Reopen Coffin Burial (Muslim faith)	0	0	0	0	0

- 9 Further to this, Table 4 presents the list of cemeteries within the Bromsgrove and Redditch area, including whether there is accommodation for new burials and whether the cemeteries can accommodate for Muslim burials.

Table 4. New Burial Provision within Bromsgrove and Redditch Cemeteries.

Cemetery	Accommodating for New Burials?	Muslim Burial Provision?	Notes
Bromsgrove New Cemetery, Church Road, Bromsgrove B61 8QH	No	No	No new graves are available.
North Bromsgrove Cemetery, Barley Mow Lane, Catshill, Bromsgrove B61 0LU	Yes	Yes	The newest of cemeteries under Bromsgrove and Redditch Council, enough space remaining for many years currently with the authority owning the land next door and beyond. This Cemetery also holds a Muslim burial section.
Bromsgrove Old Cemetery, Church Lane, Bromsgrove B61 8QH	No	No	No new graves are available.
Abbey Cemetery and Redditch Crematorium, Bordesley La, Redditch B97 6RR	Yes	Not Currently	Approximately 50 full grave spaces left. Work currently underway to source room for a further 15 Muslim burials.
Plymouth Road Cemetery, Plymouth Road, Redditch, B97 4PX	No	No	Plymouth Road is closed, and no new graves are available.
Edgioake Cemetery, Edgioake Lane, Redditch, B96 6BG	Yes	No	sufficient room for roughly 50 grave spaces.

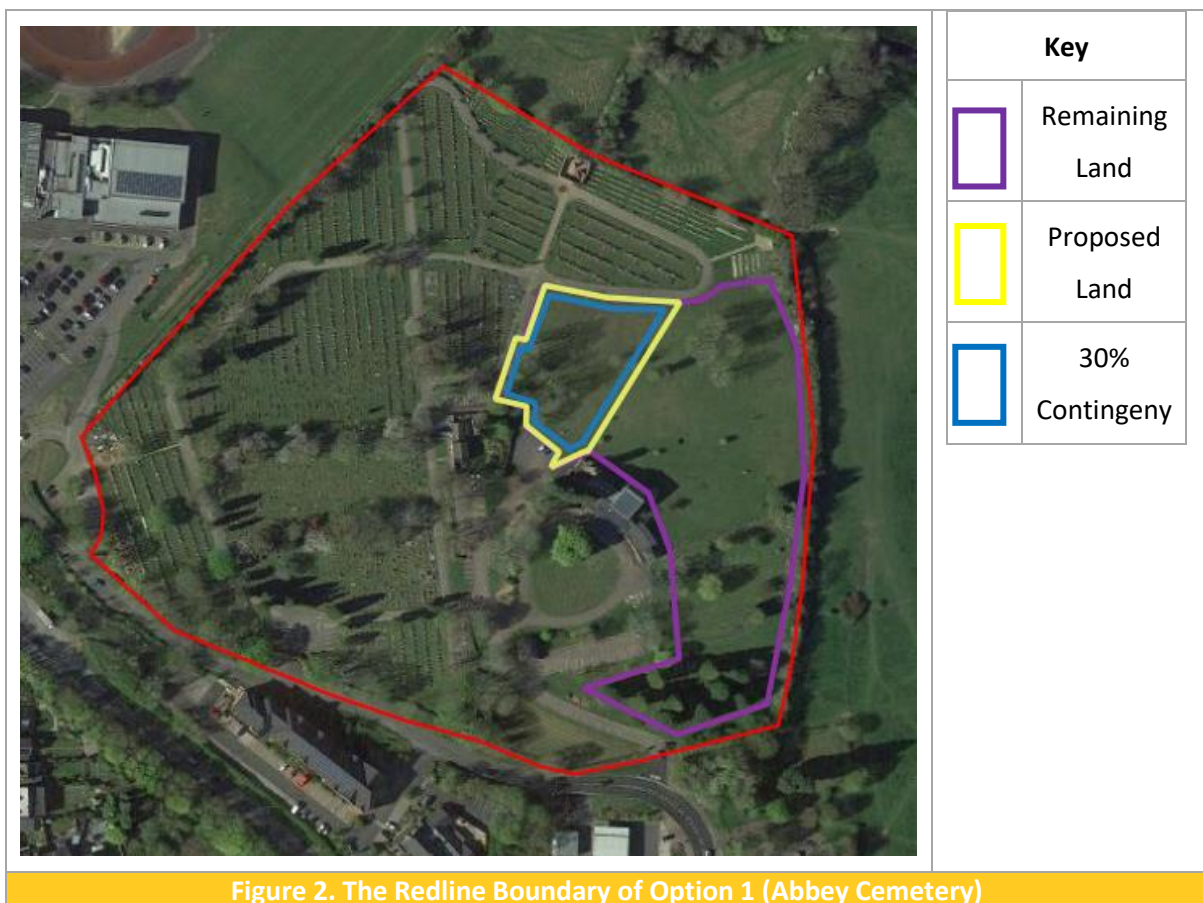
- 10 There are a recorded 100 new grave plots remaining between Abbey Cemetery and Edgioake Cemetery. Moreover, from satellite imagery screening, there appears to be approximately 1 acre of free space remaining at North Bromsgrove Cemetery. CDS assume that there is space for approximately 800 burials per acre. Therefore, there is a calculated total of 900 burial spaces remaining.
- 11 From the average of 71 burials per annum across Bromsgrove and Redditch areas (in Table 3), this leaves approximately 12 years remaining of burial space.
- 12 From the published minutes of the Redditch Borough Council Executive Committee meeting (2021) regarding new cemetery provision, it was stated that deciding to not provide new provision would impact in the region of 100 families each year ⁴.

⁴ Redditch Borough Council (2021). Available from: [Issue - items at meetings - New Cemetery Provision](#)

3 Option 1 - Repurpose an area of existing ashes scattering ground at Abbey Cemetery

3.1 Background and Location

- 13 Abbey Cemetery and Redditch Crematorium, B97 6RR, has been proposed by Redditch Borough Council as an option for further burial accommodation. This would be achieved by repurposing existing space designation for ash scattering and using it to accommodate for full body interment.
- 14 The redline boundary of Abbey Cemetery (Option 1) can be seen in Figure 2, the satellite imagery shows that there is potential space for burials to the eastern area of the site, the purple polygon represents this remaining space. The yellow polygon shows the proposed area for burials and the blue polygon represents this space following a 30% contingency for hard infrastructure, tree protection orders, among others. It is understood that without repurposing the area for ash scattering, there are approximately 50 new burial plots left.



3.2 Burial Provision

- 15 From satellite imagery, it appears as if there is approximately 0.9 acres of land remaining for use (the yellow polygon in Figure 2). It is unclear how much of this land has been reserved for future burials (although as stated it has been provided that there are approximately 50 new burial plots remaining) and how much is currently used for ash scattering. However, applying a 30% contingency to the 0.9 acres (to allow for infrastructure, root protection areas etc.) leaves 0.63 acres. This provides an estimated 504 burials. Against the average of 71 new burials per annum,

this would provide burial accommodation for a further estimated 7 years which would help alleviate the burden of burial capacity across the Bromsgrove and Redditch area in the short term.

- 16 Table 5 shows the new burials for multi faith and Muslim faith alongside the numbers of new and re-open loose burials (scattered cremated remains within a plot) of the last five years. There is evidently a greater need for burial accommodation over ash scattering. This is likely because individuals will prefer to keep the ashes of the deceased to scatter in a preferred place with sentimental value.

Table 5. Selected Burials Per Annum at Abbey Cemetery (2020-2024).

Year	2020	2021	2022	2023	2024
New Coffin Grave (Multi-faith)	32	22	27	26	37
New Coffin Grave (Muslim)	11	3	5	8	8
New Purchased Loose Burial	1	1	3	1	0
Re-Open Loose Burial	2	5	8	2	5
Exhumation of Ashes	1	1	2	0	2

3.3 Limitations of Repurposing

- 17 There is limited information on repurposing ash scattering land for burials. However, the reuse of graves is a similar topic and it is understood from The Law Commission that a grave can be reused after 75 years of the original burial⁵. This is of course permitting consent from the family of the deceased person, should there be an objection no reuse can occur for another 25 years.
- 18 It is therefore concluded that there is no current legislation stating that the repurposing of ash scattering land for burial use is not permitted. Furthermore, as this land is not including a physical burial or physical memorialisation, this topic can be taken lightly in comparison to burial re-use.

3.3.1 Public Objection

- 19 It can therefore be suggested that there is reasoning to repurpose ash scattering land for full body interment. However, there may be objection from the public regarding the existing scattered ashes in the memorial garden of Abbey Cemetery. But as there was no original burial (full body interment or ash interment), it would not be possible for any retrieval in exhumation.
- 20 During any grave reuse process, families of the buried must be consulted regarding any changes to the use of the burial ground, land management is therefore dependant on open communication⁶. Although repurposing ash scattering land is a different situation, it is still regarding the repurpose to burial accommodation and surrounds a sensitivity of the deceased. A long-term approach of communications would be necessary.

3.3.2 Loss of Revenue on Memorialisation

- 21 Should the area of memorialisation and ash scattering be repurposed for burials then there would be a loss in revenue for the service of scattering ash remains. This is a charge of £111.00 (Scattering Cremated Remains in Grave or in rose/memorial garden (Roll Back Turf) 18 years and over) as per

⁵ The Law Commission (2024). Available from: <https://lawcom.gov.uk/law-commission-considers-changes-to-update-centuries-old-burial-laws/>

⁶ FOIL (2024). Available from: <https://www.foil.org.uk/wp-content/uploads/2024/10/Burial-Laws.pdf>

the Redditch Borough Council ⁷. However, should this be repurposed for burials, the cost of a ‘full earth burial’ (18 years and over) is £802.00.

3.4 Capital Expenditure

22 Based on The CDS Group (CDS) experience and previous projects, the estimated cost for the necessary infrastructure improvements to repurpose the existing ash scattering ground at Abbey Cemetery is anticipated to be approximately £250,000. This estimate accounts for the key elements required to prepare the site for full-body interment, including internal roadway modifications, minor landscaping enhancements, and biodiversity improvements.

23 The primary scope of capital expenditure (CAPEX) includes:

- **Internal Roadway Development (£250k Allocation):**
 - Construction or reinforcement of internal access roads to ensure ease of movement for funeral services and visitors.
 - Potential resurfacing or widening of existing paths to accommodate increased footfall and vehicle access.
- **Site Preparation:**
 - No releveling required, minimizing groundwork costs.
 - Clearance and preparation of designated burial sections to ensure optimal land utilization.
- **Drainage Considerations:**
 - As no major drainage works are required, only minor adjustments may be necessary to ensure adequate surface water management and prevent localised flooding.
- **Landscaping and Biodiversity Enhancements:**
 - Minor landscaping to integrate the new burial ground seamlessly within the existing cemetery layout.
 - Planting of native species and biodiversity improvements to enhance ecological value and maintain a respectful, natural setting.

24 Given the estimated 7-year burial capacity provided by the repurposed area, this investment ensures the sustainable use of available land while balancing financial feasibility and long-term cemetery management goals. Future considerations may include incremental improvements based on public feedback and operational needs.

25 It should be noted that this is an estimate at this stage without a detailed design, and actual costs could be higher depending on various factors such as unforeseen ground conditions, additional infrastructure requirements, or regulatory considerations. Therefore, a contingency of 20-25% is recommended at this stage to account for potential cost variations. Additionally, we advise the council to undertake a **Certificate of Lawfulness** planning application once a concept design has been developed to ensure that the proposed plans align with extant permissions and legal requirements.

⁷ Redditch Borough Council (2024). Available from: [Redditch-Fees-Charges 2024-Apr](#)

4 Option 2 - Next Steps for the Proposed Site 2B: Land North of Morrisons and West of the B4497, B98 OJD. (South of Arrow Valley Country Park).

4.1 Background and Location

- 26 The Land North of Morrisons and West of the B4497, B98 OJD was considered a suitable site for cemetery development following a site feasibility report undertaken by CDS.
- 27 This site was referenced Proposed Site 2B alongside the total 13 sites assessed (of which eight were deemed suitable). The redline boundary of Proposed Site 2B is shown in Figure 3.
- 28 Furthermore, the site's location in relation to local amenities has been presented in Figure 4, the proposed cemetery location is situated within open space, south of the Arrow Valley Country Park along the B4497.



Figure 3. The Redline Boundary of Option 2 (Proposed Site 2B).

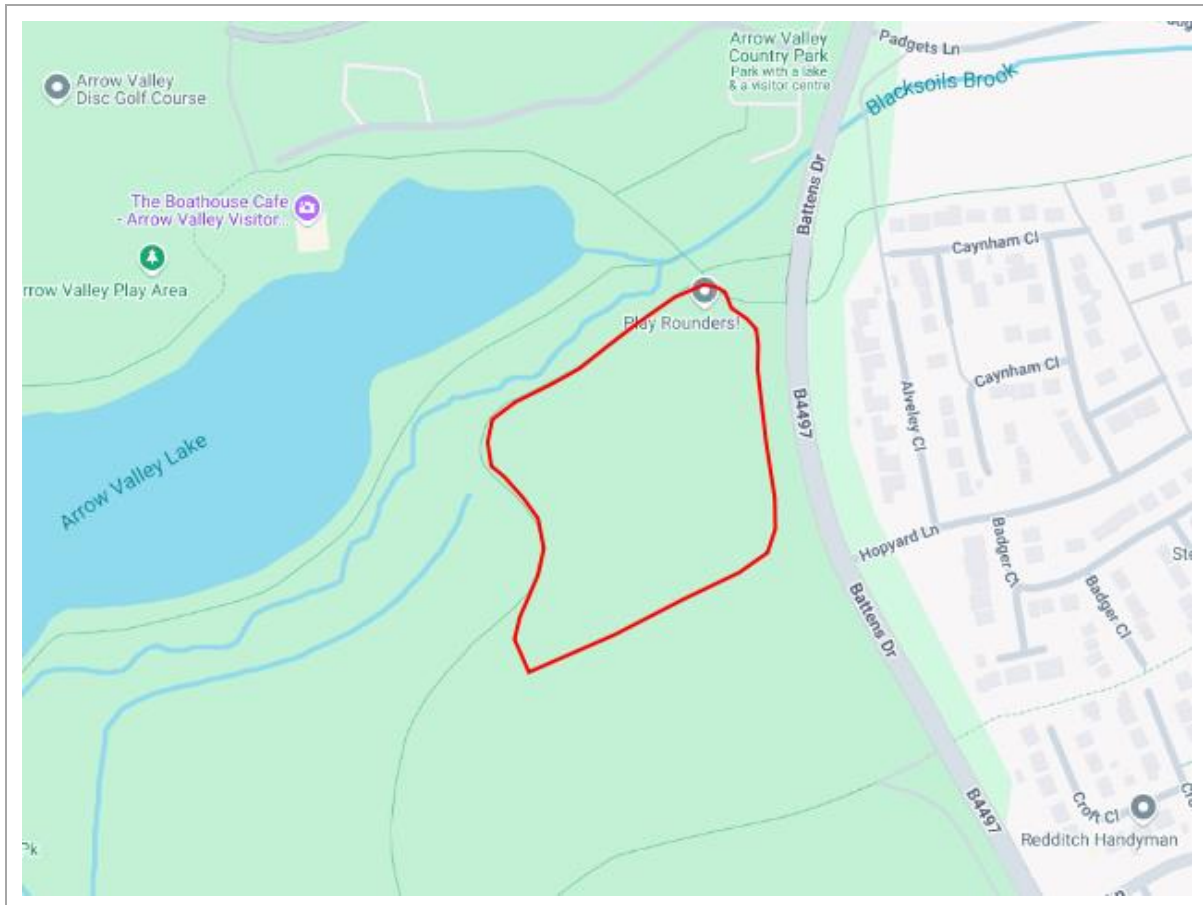


Figure 4. The Redline Boundary of Option 2 (Proposed Site 2B) Alongside the Local Amenities.

4.2 Burial Provision

- 29 The proposed site is approximately 6.2 acres. This would provide for an estimated 4,960 burials (excluding consideration for burial buffers and space for landscaping and potential infrastructure).
- 30 Against the average of 71 new burials per annum, this would provide burial accommodation for a further 69 years. This is of course a high-level calculation based off estimates, which should be noted.

4.3 Feasibility and Potential Constraints

- 31 The site feasibility report originally completed by CDS for potential burial provision across the Bromsgrove and Redditch areas assessed Proposed Site 2B. The key concerns found with the site include:
- Local Policy – The site is designated as Primarily Open Space as per the Redditch Local Plan policies map.
 - Vehicular Access - There is an existing entrance to the east of the site along the B4497 although it is currently warded off with bollards and overgrown. It would therefore need clearing up. The entrance is on a bend but the road is 40 mph and visibility splays are over 120 metres, therefore it is acceptable. Reconfiguring of the road to allow for smooth entry and exit of the site is likely.
 - Geology – There is an absence of superficial soils in the south-eastern half of the site, with deposits of Alluvium in the northwestern half. Alluvium is granular in nature and highly

permeable. The bedrock is of the Mercia Mudstone Group however which is impermeable in nature lowering the risk.

- Hydrogeology - The superficial aquifer is Secondary A and the bedrock aquifer is Secondary B.
- Groundwater Monitoring - To the north of the site there are reported groundwater strikes with groundwater encountered <1.00m depth below ground level.
- Ecology - There are areas of dense woodland surrounding the site and Arrow Valley Lake, further mitigation could be required as both are likely to provide habitats for a number of species.

4.3.1 Policy

32 There are no past or present planning applications that are impacting the site. The site is not constrained by any major local planning policy. However, as per the Redditch Local Plan policies map, the site is in a designated Primary Open Space.

33 Policy 13 'Primarily Open Space' of the Redditch Local Plan states:

"Open space will be protected and, where appropriate, enhanced to improve quality, value, multifunctionality and accessibility. In order to maintain the levels of open space provision in the Borough, proposals which would result in the total or partial loss of Primarily Open Space will not normally be granted planning permission unless it can be demonstrated that the need for development outweighs the value of the land as an open area"

34 Additionally:

"Proposals for development on Primarily Open Space land that contribute to both the Green Infrastructure Network in the Borough and the nature and purpose of the open space may be deemed acceptable by the Borough Council."

35 This demonstrates that a cemetery development would not be impacting Primary Open Space as a cemetery is green and would be protecting the 'Green Infrastructure Network' and enhancing the open space by serving the community.

4.3.2 Environment Agency – Geology and Groundwater

36 As previously stated, there are concerns regarding the geology and groundwater at the site. The geology comprises of either absent superficial deposits or highly granular superficial deposits such as alluvium. The bedrock is a more impermeable group of Mercia Mudstone however. Despite this, it is likely the Environment Agency may object to development of a cemetery at this site, due to risk of burial pollutants encountering groundwater.

37 This objection is more likely due to the previous records of boreholes accounting shallow groundwater at depths less than 1m below the surface.

38 Further investigative works such as a Tier 2 will be required to determine the suitability for a cemetery.

4.3.3 Sport England – Playing Field

39 Upon further investigation this site appears to be listed by Sport England data as a grass pitch. However, satellite imagery suggests this site has not been used as such since 2013 as there are no evident markings of a pitch or playing field following this date. Figure 5 demonstrates the changes in satellite imagery from 2013 (left) to 2025 (right).



Figure 5. Satellite Imagery Depicting Playing Field Markings in 2013 (Left) with no Markings in 2025 (Right) on the Proposed Site.

40 It is therefore believed that the site is no longer used as a playing field or for sporting use of any kind. However, there is still likely to be objection from Sport England.

4.3.4 20/01774/FULL1 – Objection Example

41 The planning application for a cemetery at Orchard Fields, Bromley, SE20, 8BG is an example of a cemetery proposal objected to by Sport England due to an existing playing field on site. This playing field in question appears neglected (for several years) and is also on a private site, not accessible to the public.

42 The letter of objection, dated 25/08/2020 concludes that *“Sport England objects to the application because it is not considered to accord with any of the exceptions to Sport England’s playing fields policy or with Paragraph 97 of the NPPF.”*

43 Furthermore, Paragraph 97 in question, now Paragraph 104 in the latest edition of the National Planning Policy Framework⁸, states as such:

“Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

44 There is strong reason to believe that Sport England will therefore object to a planning application that threatens the recorded playing field on the Proposed Site 2B, whether it is in use or not.

4.4 Public Objection

⁸ NPPF (2024). Available from: [National Planning Policy Framework](#)

45 Due to the site's location, south of the Arrow Valley Country Park, there is likely to be public objection. The site (as shown in Figures 3 and 4) is surrounded by public footpaths and the development of a cemetery may restrict the previous use that members of the public will have had with this site, such as dog walking and family games, among others.

4.5 Capital Expenditure and Timeline.

46 The estimated cost to achieve full planning permission for Proposed Site 2B is approximately £100,000, which includes professional fees and necessary planning assessments. The full site development cost is estimated between £1.25 million to £1.75 million, depending on the level of infrastructure and landscaping works required. Given the uncertainties at this stage, a contingency of 25% is recommended to account for potential unforeseen costs.

47 The primary costs involved in the development include:

- **Planning and Approval Costs (£100k at risk):**
 - Environmental Agency (EA) assessments to address groundwater and geological concerns.
 - Full planning application submission, including potential objections from Sport England and considerations for open space policy.
 - Biodiversity Net Gain (BNG) compliance requirements and mitigation measures.
- **Site Development Costs (£1.25m - £1.75m):**
 - Groundworks and drainage to meet EA and planning standards.
 - Roadway and pathway construction for site access and visitor circulation.
 - Landscaping, biodiversity improvements, and buffer zones.
 - Additional infrastructure such as fencing, memorial areas, and service facilities.

48 Estimated Project Timeline:

- **Planning Application & Approvals (18-24 months):**
 - Completion of required environmental and technical assessments.
 - Consultation with key stakeholders, including EA, Sport England, and local authorities.
 - Submission and review of the full planning application.
- **Post-Planning Design & Procurement (6-12 months):**
 - Development of detailed design based on planning conditions.
 - Tendering and procurement of contractors for site development.
- **Construction & Site Development (6 months):**
 - Groundworks, drainage, and infrastructure implementation.
 - Final landscaping, biodiversity enhancements, and service installations.
- **Settlement & Establishment Period (6-12 months):**
 - Allowing for ground settlement and grass establishment post-construction before the site becomes operational.

49 The total estimated timeline from the initial planning stages to project completion is approximately 3.5 to 4 years. Due to the higher risks associated with securing planning permission compared to Abbey Cemetery, careful consideration of regulatory requirements and stakeholder engagement will be essential to progressing the project efficiently.

5 Risk Analysis

50 The risk for both options has been assessed via Risk Register analysis. These have been presented in Tables 6 and 7. Within the risk register assessment for each option, a list of risks will be assessed for the impact level and the probability level of each risk, these will both be scored on a scale of 1-5, 1 being low risk and 5 being high risk. The overall score is assessed against the Risk Matrix, seen in Figure 6.

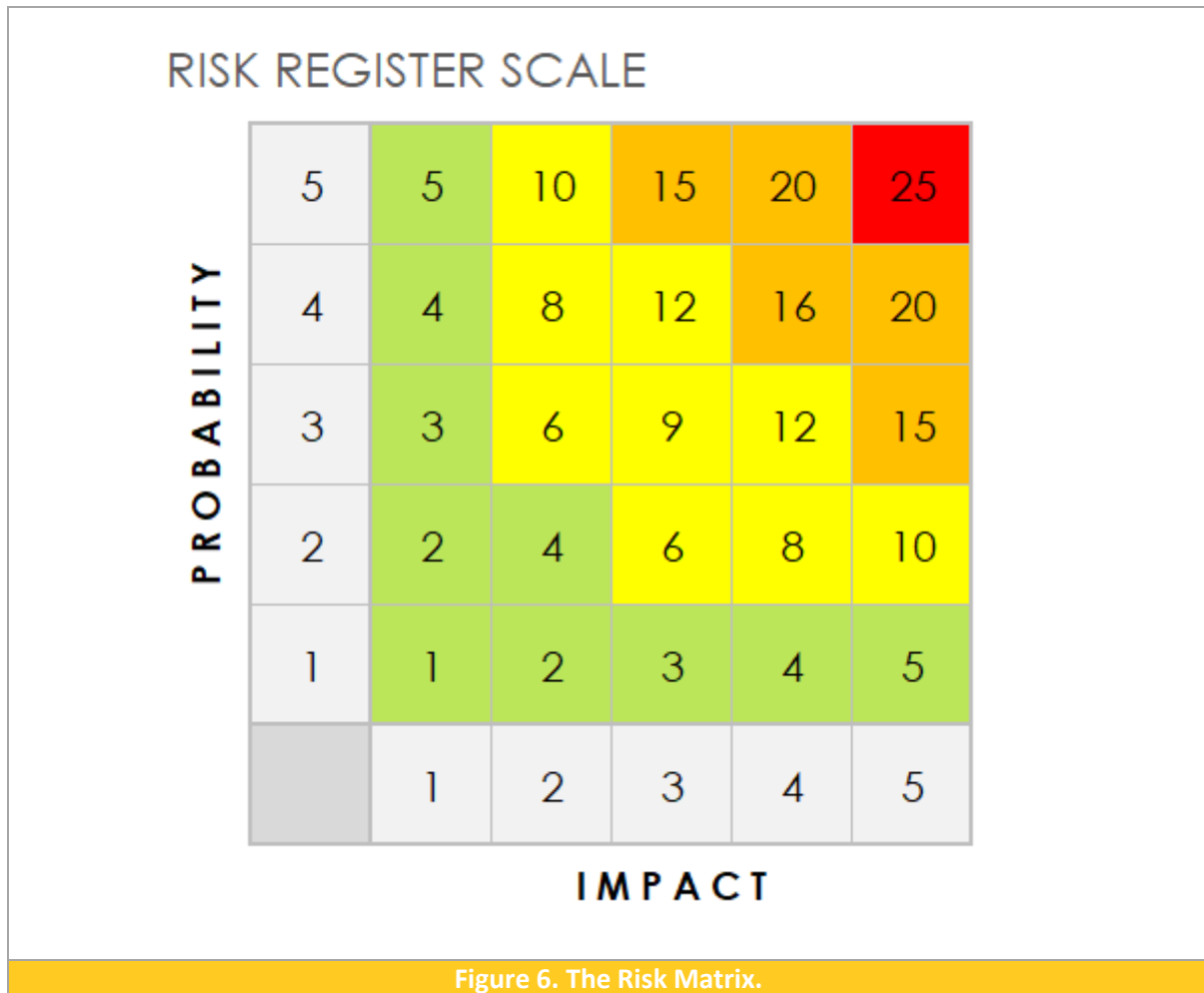


Table 6. Risk Register Assessment for Option 1.

RISK DESCRIPTION	IMPACT DESCRIPTION	IMPACT LEVEL	PROBABILITY LEVEL	PRIORITY LEVEL	MITIGATION NOTES	OWNER
Planning Risks						
Environment Agency Objection	Due to the burial use the EA will need to be consulted. There is a low probability level due to the nature of the existing site (Abbey Cemetery) being a burial ground.	5	2	10	Further field investigative works to be completed at earliest opportunity.	Environmental Engineer / Planning Agent
Public objection	Risk moderate due to sensitivity of repurposing land. However, due to the current legislative permission to conduct re-burials and carry out exhumation, there is less of a legal concern but rather a moral objection.	3	5	15	Need to conduct comprehensive public consultation to ensure the public understand need for burial space.	Planning Agent / Council
Highways	Access is already established for the existing cemetery, therefore the risk is low.	3	1	3	Engage with a highways consultant at earliest convenience.	Planning Agent/ Traffic Consultant
Site Risks						
Attenuation Basin Requirement	Surface water issues could result in the requirement for an attenuation basin which could reduce burial space on site, due to the requirement for a 30m burial buffer around drainage features.	2	3	6	Liaise with a drainage engineer early on	Civil Engineer

Drainage Outfall	Need to ensure there is a drainage outfall and get permission from the LLFA and utility company (if required). There is a risk of not being able to contain consent if the current infrastructure is overstretched.	3	2	6	Liaise with a drainage engineer early on	Civil Engineer
Contamination	Could be made ground below the site which needs treating, risk highlighted due to surrounding roads but is low as the site is not in direct proximity.	3	2	6	A Tier 2 investigation would highlight the probability of this risk	Environmental Engineer
Earthworks	Moderate risk due to nearby road.	4	2	8	Any earthworks close to road, must consult with necessary stakeholders.	Civil Engineer
TPO's / tree felling licenses	To free up burial space, tree felling may be required, the risk is moderate due to multiple trees on site.	3	3	9	Arboricultural assessment required.	Arboricultural surveyor
Project Risks						
Budgets	Investment required to accommodate burial land, this is council owned land so the risk is low. The requirement for a full planning application and extensive programme increases risk of inflation and therefore increases probability.	5	2	10	Consistent cost plans against the business case must be undertaken. A balancing measure against a new out of borough site must be reviewed.	Council / Agent
Burial Space	Certain constraints could reduce the overall burial capacity, due to new EA guidance.	4	3	12	Need to undertake all necessary pre-application steps to mitigate and reduce risk.	Planning Agent / Design team

Average Risk	8.5
Total Risk	85

Table 7. Risk Register Assessment for Option 2.

RISK DESCRIPTION	IMPACT DESCRIPTION	IMPACT LEVEL	PROBABILITY LEVEL	PRIORITY LEVEL	MITIGATION NOTES	OWNER
Planning Risks						
Environment Agency Objection	Due to a change of use - the EA will need to be consulted, and a Tier 2 Groundwater assessment will need to be completed. Moderate probability level due to site having geology of moderate risk (absent and alluvium superficial deposits) and groundwater monitoring would be required due to the recorded shallow groundwater.	5	4	20	Tier 2 Groundwater Assessment to be completed at earliest opportunity.	Environmental Engineer / Planning Agent
Archaeology Risk	Due to change of use, we will have to liaise with the county archaeologist, they may request a geophysical survey which could result in further archaeological works required. Due to the intrusive nature of burials - sometimes archaeology can be prohibitive to development on areas of the site and can result in major costs for trial trenching. However, there are no mapped archaeological sites or listed buildings in the area making this low risk.	4	1	4	To conduct early discussions with County Archaeology	Planning Agent

Public objection	Risk moderate due to sensitivity of replacing open land within a park space, the risk is therefore moderate to high.	3	5	15	Need to conduct comprehensive public consultation to ensure the public understand need for burial space.	Planning Agent / Council
Sport England Objection	The risk is moderate to high due to the site being mapped as a grass pitch on the Sport England database. Satellite imagery shows this playing field to no longer be in use, Sport England will aim to protect open space for health and wellbeing.	5	4	20	To conduct early discussions with Sport England.	Planning Agent
Ecological risks	Possibility of having to do further surveys to attain planning permission, there is dense woodland and Arrow Valley Lake bordering the site. Both are likely to provide habitats for a number of species, this provides a moderate to high risk.	4	4	16	Conduct a PEA survey at the earliest opportunity.	Planning Agent / Ecologist
Biodiversity Net Gain	Required on all new sites - must achieve >10% net gain. There are no current conservation designations on site, there is a dense woodland bordering the site, risk would be moderate. If conditions are not met planning could be rejected.	5	3	15	Need to do an early screening analysis - landscape architect must work closely with an ecologist at the earliest opportunity.	Planning Agent / Ecologist / Landscape Architect
Highways	There is historic established access currently prevented via bollards. This could be made accessible and current visibility splays are clear which provides a low risk.	4	2	8	Engage with a highways consultant at earliest convenience to undertake assessment.	Planning Agent/ Traffic Consultant

Planning Consent	This application is not impacted by any conservation policy but there is the difficulty of geology and groundwater risk. If all necessary steps are taken and the need is strong to be placed on this site, then a consent could be granted but risk is moderate.	5	4	20	Need to undertake all necessary pre-application steps to mitigate and reduce risk.	Planning Agent
Site Risks						
Attenuation Basin Requirement	Surface water issues could result in the requirement for an attenuation basin which could reduce burial space on site, due to the requirement for a 30m burial buffer around drainage features.	2	3	6	Liaise with a drainage engineer early on	Civil Engineer
Drainage Outfall	Need to ensure there is a drainage outfall and get permission from the LLFA and utility company (if required). There is a risk of not being able to contain consent if the current infrastructure is overstretched.	3	2	6	Liaise with a drainage engineer early on	Civil Engineer
Contamination	Could be made ground below the site which needs treating, risk highlighted due to surrounding roads, but is low as the site is not in direct proximity.	3	2	6	The Tier 2 investigation will highlight the probability of this risk	Environmental Engineer
Earthworks	Moderate risk due to nearby road.	4	2	8	Any earthworks close to road, must consult with necessary stakeholders.	Civil Engineer
TPO's / tree felling licenses	To free up burial space, tree felling may be required, the risk is low with trees only bordering the site.	1	3	3	Arboricultural assessment required.	Arboricultural surveyor

Project Risks						
Budgets	Significant investment required for change of use to burial land, this is council-owned land so the risk is lower. The requirement for a full planning application and extensive programme increases risk of inflation and therefore increases probability.	5	3	15	Consistent cost plans against the business case must be undertaken. A balancing measure against a new out of borough site must be reviewed.	Council / Agent
Burial Space	Certain constraints could reduce the overall burial capacity, due to new EA guidance.	4	3	12	Need to undertake all necessary pre-application steps to mitigate and reduce risk.	Planning Agent / Design team
Average Risk				11.6		
Total Risk				174		

5.1 Summary

- 51 The risk register analysis shows both Option 1 and Option 2 to be of moderate risk during a planning application process. Option 2 does have a higher total risk of 174 with an average of 11.6, Option 1 in comparison has a risk total of 85 and an average risk of 8.5.
- 52 The key risks for Option 1 include the archaeological risk and public objection. The key risks for Option 2 include the potential objection from the Environment Agency and the risk of ecology, public objection, and Sport England objection regarding a lack of playing field facilities. Furthermore, as this development would require a change of use, unlike Option 1, there is a greater risk retrieving planning consent.
- 53 When considering burial capacity timeframes, Option 1 would be suitable for short-term alleviation by providing burial capacity for a further estimated 7 years, whereas burial space as a result of a full planning application for a change of use (such as Option 2) would future proof burial provision.
- 54 Of course, the budgeting outcomes do differ and CAPEX analysis shows Option 2 to have a predicted cost of £100,000 for a full planning application, followed by £1.25 million to £1.75 million for full site development. Whereas the cost for development for Option 1 is approximately £250,000.
- 55 It is recommended that the risk register analysis in Tables 6 and 7 are thoroughly considered to review an option moving forward. Option 1 is initially recommended as it would alleviate the burden of burial capacity in the short-term, but a further planning application for a cemetery is recommended in the long-term. CDS recommend that Redditch Borough Council begin considering the provision of a new cemetery as this type of development can take approximately four to five years from inception to operation.

6 Conclusion

- 56 The purpose of this report was to review the risk analysis of two options for the future burial provision for Redditch Borough Council. Option 1 being to repurpose an area of existing ash scattering land at Abbey Cemetery, and Option 2 being the next steps for the Proposed Site 2B cemetery development.
- 57 The demographic analysis of the Bromsgrove and Redditch area showed both an increasing and aging population which would provide a strain on current burial provision. Investigation into burial statistics in the area demonstrated the average number of multi-faith new coffin graves (burials) from 2020 to 2024 to be calculated as 71 per annum.
- 58 Moreover, of the existing cemeteries across the Bromsgrove and Redditch area, there are a recorded 100 new grave plots remaining between Abbey Cemetery and Edgioake Cemetery and from satellite imagery screening, there appears to be approximately 1 acre of free space remaining at North Bromsgrove Cemetery. This has been calculated to provide a predicted 12 years remaining of burial space. Therefore, an option providing the most burial provision is strongly advised.
- 59 Option 1 (repurposing at Abbey Cemetery) provides an estimated burial accommodation for a further 7 years (including a 30% contingency) and Option 2 provides an estimated burial accommodation for a further 69 years.
- 60 Regarding the possibility of repurposing ash scattering land (Option 1), there is limited information on this action across existing burial grounds. Public objection is a main concern due to the ethical issue of reusing a memorial space for burials, however its closest similarity of conducting new burials in the replacement of old existing burials, is permitted (under regulation). Moreover, there is no current legislation stating that the repurposing of ash scattering land for burial use is not permitted.
- 61 Option 1 is the Less costly of the two options as it is an existing burial ground and would be a case of road infrastructure to allow access. If the decision is to move forward with Option 1, obtaining a certificate of lawfulness is recommended once a concept design has been developed.
- 62 Option 2 is the more costly of the two as full planning application for change of use required. There is the potential for EA and Sport England concerns, due to the higher risks associated with securing planning permission compared to Abbey Cemetery, careful consideration of regulatory requirements and stakeholder engagement will be essential to progressing the project efficiently.
- 63 Redditch Borough Council should consider the CAPEX and risk register analysis for both options, with focus on Tables 6 and 7. Following an option choice, it is recommended that these potential objections are to be addressed and stakeholder engagement and relevant surveys should be instigated.
- 64 When regarding the remaining burial space across the Bromsgrove and Redditch area, Option 1 would be suitable for short-term alleviation by providing burial capacity for a further estimated 7 years. This allows Redditch Borough Council time to investigate developing future burial provision by a new planning application for a cemetery. CDS recommend that Redditch Borough Council begin considering the provision of a new cemetery as this type of development can take approximately four to five years from inception to operation.

7 Report Verification

Report Completed By: Jessica Cheal MSc, Graduate Planner

Report Sign Off: Ben Copeland BSc (Hons), Senior Planning Projects Manager

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