

**FURTHER LODGED  
REPRESENTATIONS**

**From:** [Alistair Hilton](#)  
**To:** [Sarah Forsyth](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 21 March 2022 14:53:24

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Thank you for your email.

I can advise that Dundee City Council does not wish to make any representations.

Regards,

Alistair Hilton  
Principal Planning Officer  
Planning Team  
City Development Department  
Dundee City Council  
50 North Lindsay Street  
Dundee  
DD1 1LS

E-mail: [alistair.hilton@dundeecity.gov.uk](mailto:alistair.hilton@dundeecity.gov.uk)

Telephone: 01382 433760

Corporate Web Site: [www.dundeecity.gov.uk](http://www.dundeecity.gov.uk)

**From:** [customerservices@dundeecity.gov.uk](mailto:customerservices@dundeecity.gov.uk) <[customerservices@dundeecity.gov.uk](mailto:customerservices@dundeecity.gov.uk)>  
**Sent:** 21 March 2022 11:18  
**To:** planning <[planning@dundeecity.gov.uk](mailto:planning@dundeecity.gov.uk)>  
**Subject:** Fw: Application for Review - Land North East of Duntrune House, Duntrune

Good Morning

Please see the email below pertaining to your department. Can you respond directly to the customer and copy [customerservices@dundeecity.gov.uk](mailto:customerservices@dundeecity.gov.uk)

Regards  
Customer Services

On 11 Mar 2022, [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk), wrote...

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

## Application No 20/00830/FULL - DMRC-4-22

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations.

**These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**Jane Conley**

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**From:** Anderson <[REDACTED]>  
**Sent:** 12 March 2022 12:00  
**To:** Sarah Forsyth  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Attachments:** Planning Objection Duntrune Crem review response (1).doc  
**Importance:** High

Dear Ms Forsyth,

I would like to respond on behalf of the Murroes and Wellbank Community Council in regards to the appeal application No 20/00830/Full- DMRC-4-22. Please find attached concerns from the Murroes and Wellbank CC, in regards to the points in the appeal statement and our objection to the appeal of this application.

regards

Murroes and Wellbank CC

----- Original Message -----

**From:** "Sarah Forsyth" <ForsythSL@angus.gov.uk>  
**To:**  
**Sent:** Friday, 11 Mar, 22 At 16:09  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

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Kind regards

Sarah

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# Murroes and Wellbank Community Council

Sarah Forsyth  
Committee Officer  
Angus Council

Dear Ms Forsyth,

Concern over Planning Application No 20/00830/FULL - DMRC-4-22

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

We as a Community Council firmly believe in supporting entrepreneurs in developing new business opportunities in the local community. We also ensure that there is a transparent approach to communications and discussion with developers/entrepreneurs and objectors in regards to Planning Applications in accordance with the Constitution for the Murroes and Wellbank Community Council.

As such we are disappointed to read the gross inaccurate information in the application review document presented to Angus Council by Agents representing the developer. Murroes and Wellbank Community Council would like to clarify the position as follows:

**Appeal Statement 11.8** -The Community Council objected to the application. The policies which they cite in support of their objection have either been addressed in the Report of Handling as not being breached or have been addressed in this Statement and also shown not to be breached.

- **Community Council Response-** The opinion of the Community Council is there has not been suitable address of the issues in the main points of our objection submitted in January 2021 and or our further objection in October 2021.

**Appeal Statement 11.9-** It is disappointing that the Community Council does not address the societal and economic impacts on Angus residents who have to pay more for cremations than anyone else in the UK given the lack of competition. Nor do they address the fact that local residents require to travel many miles to the nearest crematorium, which is out with the recommended travel distance. The Community Council should have considered the development in light of the need for such a facility and the benefits which it would have for the local community. The need was highlighted by members of the community in letters of support, but has been ignored by the Community Council.

- **Community Council Response-** The Community Council dispute the statement above as the planning application did not guarantee any reduction in funeral costs to the area. The issue of travel is important, but what is more important is people can travel and access the facility/development safely and this proposal presented significant dangers for the

individuals attending this development along with individuals who were going about their daily life surrounding the facility. The statement concerning the need for this facility is overstated in the opinion of the Community Council considering the objection from the operators of the Crematorium at Friockheim, confirming the facility is operating under capacity.

**Appeal Statement 11.10-** It is understood that pressure was also put on the Community Council by the third party objectors who formed the "Stop the Crematorium" action group, which group refused to allow the Applicant to speak to the Community Council without the objectors being present and able to engage. Several attempts were made to make suitable arrangements, but many were cancelled after the Community Council's further consultation with the objector group representative. Had the Applicant been able to address the Community Council, the need for and benefits of a new crematorium in the locality would have been explained to them.

- **Community Council response** -The only pressure being applied to the Community Council was by the Applicant, who wanted to have an offline meeting with the Community Council, which was contrary to the Constitution of the Community Council. There were numerous times Murroes and Wellbank Community Council offered the Applicant/Agent to attend the public open meetings to present information concerning the development, but each offer to attend was declined unless no questions were asked by attendees, which we the Community Council find disappointing and unacceptable considering public concerns.

**Appeal Statement 11.11-** It is submitted that the Community Council's objection cannot outweigh the presumption in favour of development having regard to the developments' overall conformity with the development plan and the need for the facility.

- **Community Council response** -The Community Council find statement 11.11 disappointing and disrespectful of the 775 objections, the vast majority from the local community, based on concerns with the safety in their community and the poor accessibility of the proposed development.

As per the Murroes and Wellbank Community Council objections submitted in January 2021 and our further addendum in October 2021, we consider the proposed application would result in an unsustainable pattern of travel and the development would not be accessible by a choice of transport modes, increasing reliance on the private car in a situation where access to walking, cycling and public transport is poor. The proposal is there for contrary to the TAYplan policies 1 and 2, Angus Local Development Plan policies DS2, DS3, TC8 and Scottish Planning Policy in so far as it relates to locating developments in accessible locations.

The application is contrary to Policy DS1 of the Angus Local Development Plan 2016, because the scale and nature of the development is not appropriate for its location.

regards

Murroes and Wellbank Community Council

**From:** [Andy Barnes](#)  
**To:** [Sarah Forsyth](#)  
**Cc:** [ROADS](#); [Craig W Hudson](#); [Iain KS Leith](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 11 March 2022 16:25:40  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

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Sarah

The Roads & Transportation service has no further comments on the above application.

Regards

Andrew Barnes | Team Leader - Traffic | Angus Council | Tel: 01307 491770 | Email: [barnesa@angus.gov.uk](mailto:barnesa@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)>  
**Sent:** 11 March 2022 16:10  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune  
**Importance:** High

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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Kind regards

Sarah

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**From:** [Milne, Alasdair](#)  
**To:** [Sarah Forsyth](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 11:37:39

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OFFICIAL

Sarah

Thank you for your email.

I can confirm that the Scottish Environment Protection Agency has no further comment to offer on this application and would rest on our previous consultation responses.

I trust this brief email is of assistance – please do not hesitate to contact me if you require any further information.

Regards  
Alasdair

[Alasdair Milne](#)  
Senior Planning Officer  
Scottish Environment Protection Agency  
Strathallan House  
Castle Business Park  
Stirling  
FK9 4TZ

Telephone 01786 452537  
Mobile 07827 978405  
[www.sepa.org.uk](http://www.sepa.org.uk)

---

**From:** Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)>  
**Sent:** 11 March 2022 16:10  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune  
**Importance:** High

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**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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## Standard Letter

Dear Ms Forsyth

Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)

Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely

REFVAL	NAME	ADDRESS		
20/00830/FULL	A White	39 Mains TerraceDundeeDD4 7BZ		
20/00830/FULL	Alistair & Mhairi Moir	9 Westhall TerraceDuntruneDundeeDD4 0SN		
20/00830/FULL	Angus McRae	1 Isla AvenueCarnoustieDD7 6GL		
20/00830/FULL	Anne Chien	5 Heron PlaceKingennieDundeeDD5 3PR		
20/00830/FULL	Anne M Bruce	5 Westhall TerraceDuntruneDundeeDD4 0SN		
20/00830/FULL	Anne Wise	8 Lime GroveBroughty FerryDD5 3GJ		
20/00830/FULL	Barbara Morgan	15 Silver Birch DriveBallumbie Castle EstateDundeeDD5 3NS		
20/00830/FULL	Carole Leslie	37 Albert RoadBroughty FerryDundee DD5 1AY		
20/00830/FULL	Danielle Mitchell	18 Westhall TerraceDuntruneDD5 0SN		
20/00830/FULL	David Murdoch	1 Backmuir RoadDuntruneDundeeDD4 0PP		
20/00830/FULL	Deborah Mooney	Mill Of Brighty Farm CottageGagieDundeeDD40PS		
20/00830/FULL	Doc Ritcherich	Kilferin GardenDuntruneDundeeDD4 0PJ		
20/00830/FULL	Dr Euan James	15 Ballumbie DriveDundeeDD40NP		
20/00830/FULL	Dr Jason McNulty	WoodviewBucklersheadDD5 3PD		
20/00830/FULL	Dr Pauline Farmer	HIGH BROOM HOUSEDUNTRUNEDUNDEEDD4 0PH		
20/00830/FULL	Dr Sheila Gibbs	West Cottage Valgreen Duntrune Dundee Dd4 0pl		
20/00830/FULL	Dr Stuart Farmer	High Broom HouseDuntruneDUNDEEDD4 0PH		
20/00830/FULL	Emma McRae	1 Isla GardensCarnoustieDD7 6GJ		
20/00830/FULL	Gwen and David Fenton	1 Applehill View, WellbankBroughty FerryDundeeDD5 3UE		
20/00830/FULL	Hannah Murdoch	1 Backmuir RoadDuntruneDundeeDD4 0PP		
20/00830/FULL	Heather Turpie	11 Ashkirk PlaceDundeeDD4 0TN		
20/00830/FULL	I Matthews	Flat 3 Duntrune HouseDuntruneDundeeDD4 0PJ		
20/00830/FULL	Ian Robertson	Flat 1 Duntrune HouseDuntruneDundeeDD4 0PJ		
20/00830/FULL	Joanna Butchart	42 Oak LoanBaldovieDundeeDD5 3UQ		
20/00830/FULL	Joanne Farr	33 Silver Birch DriveBaldovieDD5 3NS		
20/00830/FULL	John McIlravey	2 Keillor CroftBucklersheadAngusDD5 3NT		
20/00830/FULL	Kenneth Thomson	Ferry BankDuntruneDundeeDD4 0PP		
20/00830/FULL	Lee Walls	28 Lochalsh StreetDundeeDD5 3HY		
20/00830/FULL	Lesley Murdoch	1 Backmuir RoadDuntuneDundeeDD4 0PP		
20/00830/FULL	Lynne Duncan	34 Post Box RoadBirkhillDundeeDD2 5PX		
20/00830/FULL	Margaret Duncan	18 Elm RiseBaldovieDundeeDD5 3UY		
20/00830/FULL	Mark Moores	The New Schoolhouse 15A School RoadWellbankAngusDD5 3PL		
20/00830/FULL	Miss Abigail Perkins	22 Hawthorn GroveBallumbie Castle EstateDundeeDD5 3NA		
20/00830/FULL	Miss Alison Kay	Woodside CottageShielhillDundeeDD4 0PW		
20/00830/FULL	Miss Alix Guthrie	High Greenbank FarmDarvelKA17 0LH		
20/00830/FULL	Miss Angela Anderson	16 Lime GroveBallumbie Castle Estate. BaldovieAngusDD5 3GJ		
20/00830/FULL	Miss Clair Bell	15 Westhall TerraceDuntruneAngusDd4 0sn		
20/00830/FULL	Miss Erica Taylor	Tigh Na GlasaichKellasDundeeDD5 3PD		
20/00830/FULL	Miss Fiona Baird	89 Gosberton RoadLondonSW12 8LG		
20/00830/FULL	Miss Gill Rourke	3 South Kingennie SteadingsBroughty FerryDundeeDd5 3Pa		
20/00830/FULL	Miss Gillian Russell	6C/3West Silvermills LaneEdinburghEH3 5BD		
20/00830/FULL	Miss Jenny Rourke	67 Crosshill TerraceWormitDundeeDD6 8PS		
20/00830/FULL	Miss Kate Macdonald	46 Kellas RoadWellbankDundeeDd53pe		
20/00830/FULL	Miss Kirsty Jessop	Woodside Cottage, ShielhillTealingDundeeDD4 0PW		
20/00830/FULL	Miss Kirsty Greenhill	3E Crimon PlaceAberdeenAB10 1RY		
20/00830/FULL	Miss Laura Harvey	6 Westhall TerraceDUNTRUNEDundeeDD40SN		
20/00830/FULL	Miss Lauren Waugh	3 Carron WayNormanbyHartlepoolTS6 0HD		
20/00830/FULL	Miss Lauren Wilson	8 Countesswells Park RoadAberdeenAB15 8FH		
20/00830/FULL	Miss Lee Ashton	Westfield HouseDuntruneDundeeDD40PP		
20/00830/FULL	Miss Lisa Hampton	BraeheadKellasDundeeDD5 3PD		
20/00830/FULL	Miss Madi Fergusson	WillowbankBraeside Of GagieKellasDd5 3pp		
20/00830/FULL	Miss Nicola Clark	6 Braeside CottagesBurnside Of DuntruneDUNDEEDD4 0PF		
20/00830/FULL	Miss Sarah Cruickshank	19 Hill StreetBroughty FerryDundeeDD5 2JQ		
20/00830/FULL	Miss Sarah Hebertson	Elmwood CottageBarns Of WedderburnDundeeDd4 0PG		
20/00830/FULL	Miss Sharon Davis	35 Belmont GardensAshgrove RoadAberdeenAB25 3GA		
20/00830/FULL	Miss Sharon Monaghan	5 Woodside CottagesAngusDd40pw		
20/00830/FULL	Miss Sophie Aitken	Fa'side LodgeDuntruneDundeeDD4 0PP		
20/00830/FULL	Miss Tracy Watson	2 GagiebankWellbankDundeeDD5 3PT		
20/00830/FULL	Miss Yvonne Robinson	The PaddockNewbigging RoadAngusDD4 0QX		
20/00830/FULL	Mr & Mrs Robert & Marian Hamilton	The WillowsDuntruneDUNDEEDD4 0PP		
20/00830/FULL	Mr Alan Falconer	Westfield HouseDuntruneDD4 0PP		
20/00830/FULL	Mr Alan Macdonald	44 Peebles DriveDundeeDD4 0TF		
20/00830/FULL	Mr Alastair Waugh	40 Oak LoanBaldovieDundeeDD5 3UQ		
20/00830/FULL	Mr Alexander Stewart	17 Applehill DriveWellbankDD5 3UD		
20/00830/FULL	Mr Alistair Greenhill	1 Ballat CottagesBalfron StationGlasgowG63 0SE		
20/00830/FULL	Mr A Greenhill	WESTHALL FARMKELLASDUNDEEDD5 3PD		
20/00830/FULL	Mr Allan Martin	The CairnDuntruneDundeeDD4 0PP		
20/00830/FULL	Mr Andrew Taylor	Tigh Na GlasaichKellasBy DundeeDD5 3PD		
20/00830/FULL	Mr Andrew Wight	Marchfield HouseDuntruneDundeeDD4 0PP		
20/00830/FULL	Mr Angus Brodie	19 Pleasance CourtDundeeDD15BB		
20/00830/FULL	Mr Barrie Jack	Main WingDuntrune HouseDuntruneDUNDEEDD4 0PJ		
20/00830/FULL	Mr Brian Slater	BrimarannKellasDundeeDD5 3PD		
20/00830/FULL	Mr Charlie Mills	2B Delia StreetLondonSW18 2BU		
20/00830/FULL	Mr Chris Hainey	Pitkerro Mill HouseKellas RoadDundeeDd5 3nx		
20/00830/FULL	Mr Chris Kempton	1 Denside ParkWellbankDD5 3PN		
20/00830/FULL	Mr Craig Thomson	17A Mattocks RoadWellbankDundeeDD5 3PJ		
20/00830/FULL	Mr Daniel Stirling	85 Silver Birch DriveBaldovieDundeeDD5 3NS		
20/00830/FULL	Mr David Farr	33 Silver Birch DriveBaldovieDundeeDD53NS		
20/00830/FULL	Mr David Fisher	81 Silver Birch DriveDundeeAngus		
20/00830/FULL	Mr David Gray	4 Applehill WalkWellbankBroughty FerryDd5 3uh		
20/00830/FULL	Mr David Milne	9 Elm RiseBaldovieBroughty FerryDD5 3UY		
20/00830/FULL	Mr Derek Arthur	9 Ballumbie DriveDundeeDD4 0NP		
20/00830/FULL	Mr Edward Rourke	67 Crosshill TerraceWormitFifeDD6 8PS		
20/00830/FULL	Mr Eric Anderson	The School HouseMurroesDuntruneDundeeDD4 0PL		
20/00830/FULL	Mr Fergus Clark	5 South Kingennie SteadingsKingennieDundeeDD53PA		
20/00830/FULL	Mr Gareth Fergusson	Willowbank Braeside of Gagie, Kellas Dundee DD5 3PP		
20/00830/FULL	Mr Gavin Kerr	54 Oak LoanDundeeDD5 3UQ		
20/00830/FULL	Mr Gavin McKay	Eglismonithie GardenDuntruneDundeeDD4 0PJ		
20/00830/FULL	Mr George McGurk	Old Smithy, Newbigging RoadTealingDundeeDD4 0QX		
20/00830/FULL	Mr George Orr	Elmwood CottageBarns Of WedderburnDundeeDd4 0pg		
20/00830/FULL	Mr Gordon Armitage	The Cottage West Denside By KellasDundeeDundeeDD5 3QE		
20/00830/FULL	Mr Graeme Wighton	266Broughty Ferry RoadDundeeDD4 7ne		
20/00830/FULL	Mr Graham Taylor	Craighill Farm CottageCraighill FarrmDuntruneDD4 0PH		
20/00830/FULL	Mr Ian and Moira McLaren	HazelbankMurroes, By Broughty FerryDundeeDD5 3PB		
20/00830/FULL	Mr Ian Bullock	38 Peebles DriveDundeeDD5 3PD		

20/00830/FULL	Mr Ian Usher	Rehsu CottageBrightyDundeeDD4 OPU		
20/00830/FULL	Mr James McDonald	47 Silver Birch DriveBaldovieDundeeDD5 3NS		
20/00830/FULL	Mr James Gibb	6 Barns Of WedderburnDuntruneBy DundeeDD40PG		
20/00830/FULL	Mr James Millar	1 Broadford Terrace Dundee DD5 3EF		
20/00830/FULL	Mr James P Carr	Mill CottageMill Of Murroes FarmKellasDD53PD		
20/00830/FULL	Mr James Thomson	15 Keillor CroftKellasBroughty FerryDUNDEEDD5 3NT		
20/00830/FULL	Mr John G Cathro	12 Braeside CottageBurnside Of DuntruneDD4 OPF		
20/00830/FULL	Mr John McLaren	Corner CottageKellas,Broughty FerryAngusDD5 3PD		
20/00830/FULL	Mr John Penny	Bridge CottageBurnside Of DuntruneDundeeDD4 OPF		
20/00830/FULL	Mr Jonny Mcdermott	81 Ballumbie GardensDundeeDd40nr		
20/00830/FULL	Mr Kenneth Patterson	West Stables, Pitkerro HouseBaldovieDundeeDD5 3NX		
20/00830/FULL	Mr Lee Guthrie	8 The PoplarsDundeeDd4 0xe		
20/00830/FULL	Mr Mark Finnie	46 Hawthorn GroveDundeeDd53na		
20/00830/FULL	Mr Michael Davis	Craigowl ViewDuntruneDD4 OPP		
20/00830/FULL	Mr Ncholas Steer	45 Oak LoanBaldovieBroughty Ferry, Angus.DD5 3UQ		
20/00830/FULL	Mr Neil Fleming	7 Omachie PlaceWellbankDundeeDd53ph		
20/00830/FULL	Mr Neil Scobie	Highbroom CottageBurnside Of DuntruneDundeeDD4 OPH		
20/00830/FULL	Mr Pablo Jr Alcantara	Flat 1 Duntrune HouseDuntruneDundeeDD4 OPJ		
20/00830/FULL	Mr Ralph Coates	22 Hawthorn GroveBaldovieDundeeDD5 3NA		
20/00830/FULL	Mr Raymond Din	Craigowl GablesDuntruneAngusDD40PP		
20/00830/FULL	Mr Robert Smith	37 Albert RoadBroughty FerryDundeeDD5 1AY		
20/00830/FULL	Mr Robert Sinclair	15 Watt TerraceMonifiethDD5 4UU		
20/00830/FULL	Mr Rod Gordon	North LodgeBurnside Of DuntruneDundeeDD4 OPF		
20/00830/FULL	Mr Rod Mackie	36A Ballumbie GardensDundeeDd4 0NR		
20/00830/FULL	Mr Ross Murdoch	42 1/RBrownhill PlaceDundeeDD2 4JY		
20/00830/FULL	Mr Russell Goldsmith	4A Mattocks RoadWellbankDD5 3PJ		
20/00830/FULL	Mr Sam Di Carmine	Flat 9, 78 Broughty Ferry Road Dundee DD4 6JR		
20/00830/FULL	Mr Samuel Stewart	17 Applehill DriveWellbankDD5 3UD		
20/00830/FULL	Mr Scott George	39 Oak LoanBallumbieDundeeDD5 3UQ		
20/00830/FULL	Mr Simon McMillan	14 Lime GroveBallumbie CastleDundeeDD53GJ		
20/00830/FULL	Mr Stephen Godby	38 Peebles DriveDundeeDD4 0TF		
20/00830/FULL	Mr Stephen Lynn	The Beeches , 9 Woodside CottagesShielhill Road , West March Of DuntruneBy Tealing , AngusDD4 0PW		
20/00830/FULL	Mr Steve Kay	7 Bayfield GardensBroughty FerryDundeeDD51AX		
20/00830/FULL	Mr Steven Cameron	69 Silver Birch DrDundeeDD5 3NS		
20/00830/FULL	Mr Steven Rice	28 Kingennie RoadWellbankDd5 3pg		
20/00830/FULL	Mr Tom Clark	No 4 The CourtyardDuntrune HouseAngusDD4 0PJ		
20/00830/FULL	Mr Tom Greenhill	West Idvies FarmLethamAngusDD8 2QL		
20/00830/FULL	Mrs Allison Paterson	29 Mains TerraceDundeeDD4 7DZ		
20/00830/FULL	Mrs Andrea Crockett	25 HoldingMurroesDundee AngusDD5 3PB		
20/00830/FULL	Mrs Andrea Goldsmith	4A Mattocks RoadWellbankAngusDD5 3PJ		
20/00830/FULL	Mrs Ann Thomson	Ferry BankDuntruneDundeeDD4 OPP		
20/00830/FULL	Mrs Ashley Gray	4 Applehill WalkWellbankDundeeDD5 3UH		
20/00830/FULL	Mrs Ashley Mcgurk	Aonach MorDuntruneAngusDD4 OPP		
20/00830/FULL	Mrs Ashley Scobie	Highbroom CottageBurnside Of DuntruneDundeeDD4 OPH		
20/00830/FULL	Mrs Avril Aitken	Fa'side LodgeDuntruneAngusDD4 OPP		
20/00830/FULL	Mrs Catriona Thomson	15 Keillor CroftKellas, Broughty FerryDUNDEEDD5 3NT		
20/00830/FULL	Mrs Donna Anderson	Laridon, Drumsturdy Road,Kingennie, By Broughty Ferry.AngusDD5 3RE		
20/00830/FULL	Mrs Donna Usher	Rehsu CottageBrightyDundeeDD4 OPU		
20/00830/FULL	Mrs Elaine Stewart	10 Silver Birch DriveBaldovie, Broughty FerryDundeeDD5 3NS		
20/00830/FULL	Mrs Elaine Gibb	6 Barns Of WedderburnDuntruneBy DundeeDD40PG		
20/00830/FULL	Mrs Elizabeth Patterson	West Stables, Pitkerro House, Baldovie Dundee DD5 3NX DD5 3NX		
20/00830/FULL	Mrs Elizabeth Taylor	Tigh Na GlasaichKellas, By Broughty FerryDundeeDD5 3PD		
20/00830/FULL	Mrs Elvi Guild	27 Castleroy RoadBroughty FerryDundeeDD5 2IQ		
20/00830/FULL	Mrs Erica Mcgaughay	4 Middleton Farm CottagesMiddletonDundeeDd4 0pq		
20/00830/FULL	Mrs Fiona Rice	28 Kingennie RoadWellbankDD5 3PG		
20/00830/FULL	Mrs Flora Lowrey	2 Westhall Farm CottageKellasDundeeDD5 3PD		
20/00830/FULL	Mrs Gail Valentine	4 Hawthorn GroveBaldovieBy DundeeDD5 3NA		
20/00830/FULL	Mrs Genna Millar	3 Quarry CottagesLovehall RoadWellbankDd5 3qf		
20/00830/FULL	Mrs Gilda Wilson	Garden CottageGagie EstateBy DundeeDD4 OPR		
20/00830/FULL	Mrs Heather Finnie	46 Hawthorn GroveDundeeDD5 3NA		
20/00830/FULL	Mrs Julia Clark	No.4 The CourtyardDuntrune HouseAngusDD4 0PJ		
20/00830/FULL	Mrs jane Bell	2 gagie home farm holdings murroes Dundee DD4 OPR		
20/00830/FULL	Mrs Jillian McBride	87 Silver Birch DriveBallumbie Castle EstateBroughty FerryDD5 3NS		
20/00830/FULL	Mrs Joanna Grilli	3 Glebeland PlaceKellasDundeeDD5 3FD		
20/00830/FULL	Mrs Josephine Duncan	Touchwood DuntruneTealingDundeeDD4 OPT		
20/00830/FULL	Mrs Karen Gerrard	4 Quarry CottagesWellbankDundeeDD5 3QF		
20/00830/FULL	Mrs Kathryn Mann	Craigowl GablesDuntruneAngusDD40PP		
20/00830/FULL	Mrs Kerry Davis	Craigowl ViewDuntruneDundeeDD4 OPP		
20/00830/FULL	Mrs Kimberley Falconer	Westfield HouseWesthall TerraceDundeeDD4 OPP		
20/00830/FULL	Mrs Leona Hutton	6 Chestnut GreenDundeeDD53NL		
20/00830/FULL	Mrs Lesley Hutt	5 Kellas Road,WellbankDundeeDD5 3PE		
20/00830/FULL	Mrs Louise Butchart	113 Strathyre AvenueDundeeDd5 3GN		
20/00830/FULL	Mrs Margaret Slater	BrimarannKellasDundeeDD5 3PD		
20/00830/FULL	Mrs Michelle Greenhill	West Idvies FarmLethamAngusDD8 2QL		
20/00830/FULL	Mrs Nadine Waugh Rumbellow	40 Oak LoanBallumbie CastleAngusDD5 3UQ		
20/00830/FULL	Mrs Nahdean McLarty	21 Oak LoanBallumbie Castle EstateDD5 3UQ		
20/00830/FULL	Mrs Nancy Taylor	Tigh Na TorrKellasAngusDD5 3PD		
20/00830/FULL	Mrs Nicola Cameron	69 Silver Birch DriveDundeeDd5 3ns		
20/00830/FULL	Mrs Nicola McDermott	81 Ballumbie GardensDundeeDD40NR		
20/00830/FULL	Mrs Nikki Gilbertson	16 Fithie BankBroughty FerryDundeeDD5 3FP		
20/00830/FULL	Mrs Olwyn Jack	MAIN WING DUNTRUNE HOUSE Duntrune DUNDEEDD4 OPJ		
20/00830/FULL	Mrs Rachel Bryceland	7 Woodside CottageShielhill, TealingDd4 0pw		
20/00830/FULL	Mrs Sarah Lynn	9 Woodside CottagesShielhill RoadBy Tealing, DundeeDD4 0PW		
20/00830/FULL	Mrs Sharon Fox	58 Hawthorn GroveBroughty FerryDundeeDD5 3NA		
20/00830/FULL	Mrs Shirley Tosh	30 Hawthorn GroveBroughty FerryDundeeDD5 3NA		
20/00830/FULL	Mrs Stacie Tosh	Barns Of Wedderburn FarmhouseDundeeDD4 0PG		
20/00830/FULL	Mrs Susan Hanlon	21Huntingtower ParkGlenrothesKY6 3QF		
20/00830/FULL	Mrs Susan Hutchinson	12 Keillor CroftKellasDundeeDD53NT		
20/00830/FULL	Mrs Tracey Penny	Bridge CottageBurnside Of DuntruneDundeeDD4 OPF		
20/00830/FULL	Mrs Valerie Carr	Mill CottageMill Of Murroes FarmKellasDD53PD		
20/00830/FULL	Mrs Victoria Stewart	17 Applehill DriveDundeeDD5 3UD		



**From:** Alastair Olivier

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

I would appreciate acknowledgment of receipt of this email.

Dear Ms Forsyth,

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE) Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification. **I fully support the refusal** of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and would like to iterate my previous objection to the proposal, on each and all of the following grounds:

- There is no reasonably demonstrated need for the proposed crematorium, with both the existing regional and local facilities at Dundee and Friockheim having sufficient capacity if needed. There is thus no business case illustrating need
- The required sequential approach has not been undertaken properly which should have included sites within Dundee. This demonstrates a failure in process
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in substantially increased reliance on the car
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to an escalation of very real road traffic safety issues on a road where many accidents already occur, and where pedestrian locomotion is already difficult and unsafe, as is cycling or horse riding
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside

The applicant's appeal does nothing remotely significant enough to address the refusal of the original application. Further, nothing the appellant has submitted provides any sound rationale to set aside the policies mentioned in my next paragraph.


For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016.

I request in the strongest possible terms that the Review currently under consideration is dismissed and planning **consent is refused**.

Yours sincerely,

Alastair Olivier



**From:**   
**To:** [Sarah Forsyth](#)  
**Subject:** OBJECTION TO CREM  
**Date:** 17 March 2022 20:24:19

---

North March,  
Duntrune,  
By

DD4 0PP

Dundee,  
Dear Madam,

I am writing to you about objecting to the crematorium at Duntrune.

I hope you will understand how the people of the area feel about this application.

We live in a lovely part of Angus, the roads around us are busy with school traffic and also lorry traffic as there are two haulage firms within two miles of the proposed site. I have witnessed accidents and plenty near misses over the years. I feel no need for a crematorium as Dundee and Parkgrove are close by and are not at capacity. It would be such a shame to ruin our beautiful country side. My self and my family have lived here for many years. The community were so relieved when permission was not granted and so angry and upset that this is up for appeal.

Yours sincerely,  
Anne Cook.

Sent from my iPad

**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:Sarah.Forsyth@angus.gov.uk)  
**Cc:** [STOPDuntruneCrem@protonmail.com](mailto:STOPDuntruneCrem@protonmail.com)  
**Subject:** Application no. 20/00830/FULL-DMRC-4-22  
**Date:** 13 March 2022 19:23:04  
**Importance:** High

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Name Alistair Brown  
Address 6 Kellas Smiddy, Kellas, DD5 3GX  
date 13th March 2022

I refer to the below application and would like to reiterate my objection to this application and my support of the refusal by angus council planning department.

I do not feel there is a need for a new crematorium as there is capacity at both friockheim and dundee. The road structure surrounding the site is not suitable for a large number of vehicles, and no public transport is available to the site. I frequently walk around this area and it is unsafe as it is without an increased volume of traffic.

The development is not appropriate for the rural location which has been chosen.

For the above reasons i consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development boundaries and priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Alistair Brown

On 11 Mar 2022, at 19:07, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and

Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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<D3 Decision Notice 20\_00830\_FULL dated 24 January 2022.PDF>

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/FULL-DMRC-4-22  
**Date:** 22 March 2022 23:29:22

---

Dear Sarah

I object to the proposed new crematorium

Best Regards

Alun Barton  
4 Copper Beech Row  
DD5 3NU  
22nd March 2022

## Jane Conley

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**From:** Callum Bell [REDACTED]  
**Sent:** 25 March 2022 12:26  
**To:** Sarah Forsyth  
**Subject:** Application number 20/00830/FULL - DMRC-4-22.

Hi there,

I'd like to uphold my objection to the proposed crematorium site.

My name is Callum Bell. I stay at 24 Camperdown Street, Broughty Ferry, DD5 3AB. The date of this email is 24/02/2022.

Thank you,  
Callum Bell

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 22 March 2022 13:25:20

---

Dear Sarah Forsyth,

I thank you for the opportunity to once again raise my objections to the proposed crematorium at Duntrune.

I believe the road system is completely incapable of dealing with the gargantuan increase in traffic levels.

Also there are only a handful of buses every day so non drivers would be excluded.

Douglas Winter

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**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:12:37 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 25 March 2022 13:30:34

---

Hi Sarah,

I wish to provide the statement below as a further representation. Please let me know if you require any further information. I write this on behalf of myself and my wife Mrs Gillian Dixon so please consider this as two individuals.

Best wishes,

Dr Christopher Dixon

Ref: Duntrune Crematorium Objection (20/00830/FULL)

Having read the Council's decision regarding the rejection of the application, I wish to firstly support the statement on the access to the site. The site is not suitable or safe for pedestrian or cycle access. There are no suitable pavements on any of the surrounding access routes for at least 2 km in any direction. The access is via narrow roads with no space for pedestrians to step out of the way or for safe overtaking of cyclists. This is a wholly unsuitable location for the site.

I note from the appeal by the applicant the mention of using electrified transport and creating a bus stop. I would counter this by insisting that, should this be proposed, there should be the condition that there is minimal parking on site, i.e. a maximum of 1 bus/minibus space and 5 parking spaces on site (including all staff, visitor, and disabled spaces). This would prevent people trying to access by car, and also keep the proposal to a suitable scale (i.e. 1-2 cremations per week)

The proposal has seen very deep opposition and the applicant and decision makers should be very aware of the upset and concerns caused to local residents. It is clearly not in the public interest to permit a natural habit to be spoiled solely for commercial reasons against the will of those impacted locally. The applicant has several other options for diversification of their farmland, such as with energy crops, renewable energy generation, energy storage, etc. A crematorium is not a suitable option for this site. In any case the site should be restricted to the absolute minimal disruption, the scale of business massively reduced, and completely hidden from the road.

I would like to again point out that moving the site 1-2 km further south nearer to existing commercial/industrial sites, with suitable road access and public transport links, and closer to population centres, would be a suitable location for this. The applicant should seek agreement with the relevant landowners in one of these more suitable sites and make a new application for the proposed crematorium.

Finally I would ask that the council takes the legal AND ethical viewpoint on this application and does not allow the original rejection to be overturned on minor legal points, as there is much greater ethical dimension to this proposal amongst the local residents.

Therefore I strongly object to the proposal and hope that the original decision is not overturned following the review.

On Friday, 11 March 2022, 19:15:21 GMT, Sarah Forsyth <[forsythsl@angus.gov.uk](mailto:forsythsl@angus.gov.uk)> wrote:



Dear Sir/Madam

Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013

Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd

Application No 20/00830/FULL - DMRC-4-22

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. These should be sent directly to me.

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985| ForsythSL@angus.gov.uk  
|www.angus.gov.uk

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Ms S Forsyth,  
Communities Officer,  
Angus House.  
Orchardbank Business Park.  
Forfar  
ANGUS  
DD8 1AE

12 Hawthorn Grove,  
Balllumbie Castle Estate,  
Broughty Ferry,  
Angus  
DD53NA

14<sup>th</sup> March 2022

Dear Ms Forsyth,

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the above application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022.

I continue to fully support the refusal of the application for the reasons set out in my original objection submissions to Angus Council Planning and the refusal notice dated the 24th January 2022 . I therefore take this opportunity to re-confirm my objection to the proposed development on the following grounds:

There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required.

I believe the required sequential approach has not been properly undertaken as it should have included sites within Dundee.

The proposed site is not, and cannot, be made accessible by all modes of transport.

There will be an increased reliance on car access on unsuitable roads, known to have safety issues and a history of vehicle accidents.

I believe the development is wholly inappropriate and incongruous within this unspoilt rural area and will have a detrimental impact on the rural landscape, resulting in suburbanisation and industrialisation of the countryside.

For the above reasons I believe the proposal does not comply with Scottish Planning Policy and numerous local planning policies such as TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, DS2: Accessible Development, DS3: Design Quality and Placemaking and the Angus Local Development Plan 2016

Nothing the applicant has submitted provides sufficient justification to set aside any of these policies and the proposed development is simply a commercial operation that will add no value to the local economy.

I therefore request in the strongest possible terms that the Planning Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Elaine Barr

**APPLICATION NO. 20/00830/FULL-DMRC-4-22**

**FROM: MRS ELIZABETH JEAN GREENHILL**

**DATED: 21/03/2022**

**ADDRESS: CRAIGHILL FARM  
DUNTRUNE, BY DUNDEE DD4 0PH**

**APPLICATION FOR REVIEW ON BEHALF OF DUNTRUNE LTD (PREPARED BY BRODIES, ABERDEEN)**

**Erection of Crematorium Building and Associated Parking**

**REF: EFB/VB/BAT2494.00001**

Please see below response(s) to the specific numbered points within Applicant's above referenced document

## **1. EXECUTIVE SUMMARY**

1.1 Disagree – Please refer to the very many local, plus slightly farther afield, objectors

1.3 Strongly Disagree backed up and supported by 722 number of unique objectors. Surely, the large number of objectors dictate that this particular site is not the ideal site that families and mourners are seeking, ie to be attractive, restful and a comforting environment in which to say their last goodbyes.

1.4 All the previously submitted objections confirm to me, and obviously others, how strongly it is felt that this cannot be the suitable site.

1.5 Do not feel this is heavily prejudicing Angus residents. Don't consider that cost alone would be such a high priority for many people at this sad time. Moving away from their own closest crematorium would surely increase the travelling costs to and from thereby deleting the small saving from the actual cost of the crematorium. No guarantee Applicant would not just charge same as other local providers.

Agree competition is healthy, however, this just cannot be the best site in Angus by far.

1.6 Last sentence, "no impact on neighbouring properties" - Cannot disagree more, this must have great impact on the houses situated nearby, not to mention the inconvenience due to lack of road(s) infrastructure for the rest of us.

1.7.1 How come Parkgrove Crematorium is currently running at such a low capacity. Surely, any additional crematoria will only transfer any benefits within the Angus Community, rather than increase them.

1.7.2 Would people from areas in Dundee/other local towns in Angus who have been born, brought up, educated and spent their working lives in that kind of environment want their final goodbyes in a small Angus rural area that they may never have even visited before. Do not feel this site allows an even, fair choice to all. Again, any savings from a competitive chosen crematoria would be somewhat depleted thru travelling.

1.7.3 What other sites have been investigated and by whom? One quick example, the Aberdeen carriageway to Dundee, turn left at Toyota Garage, straight ahead there are roads along, there is road lighting already in place (for an Industrial site but not really utilised). In Dundee, however, only short distance away from current site under application but with much more to offer and ideal road conditions.

1.7.4 Must admit, cannot even begin to think about the disruption that, if chosen, this site could cause on the South-West route, ie going down and round the Bridge to Burnside of Duntrune or going round the Bridge and coming up the hill from Burnside of Duntrune.

One side of this hill is currently unfenced by Angus Council, due to cut-backs, only fluorescent posts. that continually get removed. The other side is gradually caving inwards a bit causing hiccups when a Bus or

any large Agricultural Machinery try to pass, nearly impossible (vehicles regularly come to a halt to enable this manoeuvre or reverse even back down the hill (Wing mirrors can touch at times). What happens when funeral attendees are on this road. How can this be the best site when roads are already “Unfit for current purpose without any further regular traffic”.

## **2. THE APPLICANT**

2.1 This bullet point describes the Applicant & Family very fully. This emphasises and confirms to us, as a Farming Business, the experience and knowledge the Applicant has and knows full well the implications of trying to pass cars and other vehicles whilst driving large Agricultural Machinery and / or combines on such small rural roads. This application leads to fears from others in the same business that it will make their lives more difficult and at the same time, adding additional costs, for them due to traffic congestion(s).

2.2 No comments

2.3 This seems to be in contrast to Applicant’s other reasons for providing Crematoria facilities, ie lack of, and how Angus Council desperately needs additional, competitive facilities, not to mention such a wonderful, environmental situation.

Applicant now saying we require to do this to remain viable. This statement clearly makes one feel that life is or could be tougher, what about the rest of us left to negotiate all traffic on the narrow roads surrounding our businesses to enable Applicant’s planned business to be carried out.

There are also many other areas of diversification to consider which, of course, the applicant will be aware of, ie tree planting thus, helping the environment at the same time, but allowing the rest of us to continue with current level of traffic to carry out our businesses.

2.5 Crematorium will employ 4 full time members. How could 3 services / day, ever make this a viable business considering running costs, overheads, etc. This bullet point clearly outlines an operator to run the facility. Who will be the owner in future when we, as locals, have the road problems.

## **3. SITE AND SURROUNDING AREA**

3.2 Comments OK, however, this cannot, by far, possibly be the best, desired location and site.

3.3 In past years when this field was in a Farming rotation and farmed by Neil Ogilvie (Applicant’s grandfathers day), this particular field grew successful Potatoes/Turnips/Grass and Cereals. At that time, it was a delight to drive past and see the neatly trimmed hedges kept up (no longer appear to be there). This site can therefore, and could be, good agricultural land, not the best, but viable. Lots of farmers have small, hilly areas that are still in their rotation successfully.

Clearly, the disadvantage for the Applicant in this case is that he is living probably 15 miles away from this site which makes it difficult to keep livestock there. The same applies to have machinery on site, when weather suits, for cultivation.

3.4 How can Burnside of Duntrune, Bridge, and Hill upwards and downwards, give good transport links to this site. AC cannot afford to fence the left-side of the hill coming northwards (due to cut-backs) and the other side is gradually caving out from the wood, both taking away from final road width for passing. Has the Applicant or any Road assessors actually driven or witnessed any large Agricultural Machinery on this specified road????

3.5 In previous years, the trees provided a screening from local dwelling houses and the C4 road, however, this is no longer the case.

#### **4. THE PROPOSED DEVELOPMENT**

4.3 Why not return it to its previous Agricultural form/rotation allowing big majority of the locals their wish, not to have such a site, when they are the ones that will be inconvenienced. Why should we be left with the consequences whilst the Applicant lives outwith the area/site.

#### **5. DETERMINATION OF THE APPLICATION**

5.3.2. "reasonable separation between activities" within the site and those that reside closest to the development there will be no detrimental impact. Disagree, if there is a row of cars awaiting entry to the site and Agricultural vehicle(s) at the end of the line, IT/THEY MUST WAIT. Of course, there will be a detrimental impact to public road users. Cars leaving the site and "turning right" onto the public road would surely be more than detrimental.

Road(s) alone will create many tailbacks and activities, ie detrimental impact

5.3.10 The Council's Road Service is satisfied that the traffic from the development can be accommodated within the local road network. Feel strongly, the South-West road is a disaster for lines of traffic when meeting large Agricultural vehicles. Please see 3.4 above.

#### **6. TAYPLAN POLICIES**

6.6.4 The Applicant's appeal states "A hearse drives at approximately 60% of normal road speeds, partly as a mark of respect, but also to keep the cortege vehicles together so that they arrive at the crematorium together. It is accepted that in rural areas, drive time may require to be slightly longer.

Above para confirms cortege vehicles prefer to drive together and, also at a slower pace (mark of respect), and may require slightly longer in rural areas. It is tough enough for Agricultural Machinery to negotiate surrounding roads as at present without any further traffic escalation / delays.

6.6.7 From Applicant's Appeal document "Funeral Poverty in Dundee" Would people from areas in Dundee who have been born, brought up, educated and spent their working lives in that kind of environment want their final goodbyes in a small Angus rural area that they may not ever have visited before?

6.8 From Applicant's Appeal document "It is submitted that this information demonstrates a specific local need for another crematorium in Angus and the Officer has failed to apply sufficient weight to the ability of the proposed development to prevent "leakage" of business outwith Angus to Dundee". This immediately raises the question why would a further crematorium not be situated in Central Angus rather than on the boundary with Dundee? Clearly, the current proposal does hope to recruit business from Dundee – "Funeral Poverty In Dundee" to improve choice for the consumer however, at the same time, don't let Angus leak into Dundee!! See 6.6.6 refers to combined population.

6.9 Sorry, but 24 car trips per cremation, could easily make it profit or loss for local farmers and other businesses if, and when, they are trying to secure or produce their crops in inclement weather should they be faced with hold-ups due to convoy(s) of cremation cars whenever they hit local roads.

#### **7. LDP POLICY DS1**

7.1 "there are no suitable and available brownfield sites capable of accommodating the development". Do we have evidence re this. What sites have ever been looked at??

7.4 Again, "there are no suitable available brownfield sites or land ..... With the spare areas sitting idle within outskirts of Dundee alone, find this hard to comprehend. There is an area of land, north of Whitfield, going in at the Toyota garage with road infrastructure, street lighting, etc which was previously allocated for Industrial area but still idle – just one example if we are happy to select the current

Application which is so, so, close anyway to the border of Dundee with very poor roads!! The Application sounds that the Applicant would be happy to recruit from both Angus and Dundee.

## **8. LDP POLICY DS2**

8.2 How could 3 cremations/day ever begin to pay. Even at the rate of 3/day – this is huge implications for local farmers if the rain is hanging overhead and they are desperate to gain access to and from fields, finding themselves either in a queue, or, trying to reverse down the Burnside Hill with large Farming machinery. It happens so often. Again, no mention of inconvenience to such large pieces of machinery or the greatly increased use of on-line delivery vehicles of all sizes.

8.2.1 “sometimes distressing nature of the event” – The Burnside of Duntrune Hill, north and south will certainly create distress for many drivers.

**End of last bullet point in Section 8.2.1** – no mention again of large Farming machinery or increased use of on-line delivery vehicles of all sizes.

### **8.2.2. Make provision for suitable located public .....**

All to the detriment of local farmers, businesses, on-line deliveries, and local residents.

### **8.2.3 Bus stops**

Has the Applicant himself encountered buses and electric vehicle(s) picking up and dropping off passengers when he is trying to reach his own fields on a daily-basis and at times of inclement weather?

8.2.5 Cycling. Poor drainage / puddles / floods of water on local roads for poor mourners all dressed for a funeral service and their last goodbyes. AC have had no funds, due to cut backs, over past 6 years to put in new drains / gullies to take water away. How much space would a cyclist have meeting an HGV vehicle on some of these corners.

8.2.6 Para 4-5. Again, no mention of the South-West road.

## **11. MATERIAL CONSIDERATIONS**

11.6 Who pays for Electric Vehicle(s). If mourners have to contribute, this would clearly increase their cremation costs.

Surely, there is a site in Angus or Dundee without the requirement of vehicles being supplied.

### **Statutory Consultations**

11.9 It is interesting that the local community and surrounding area(s) put forward such a high number of objectors, indicating no disinclination to travel the short distances required to either of the other local crematoria, to say their last goodbyes rather than have this new building situated on their doorstep.

### **Third Party Representations**

11.14 Some / many of us did take the time and effort to do an individual letter rather than updating template.

I can honestly say I was never at any time stopped, harassed, or questioned re my thoughts and ideas about this Planning application. My past and present experience with local roads, near misses, and accidents over 48 years made me shiver at the thought, thus drawing my own conclusions as to the outcome of such an Application.

11.16 Please can we again draw attention to the South-West road from the site. I can honestly say I have never at any time been aware of, or, applied any pressure to anyone re this site. I have, however, heard many times that the surrounding roads were a disaster / rubbish for such a venture.

New visitors to the area would have to encounter some roads that they may have never been on before and I often think of people upwards of 65 trying to encounter the Dundee – Aberdeen, road on a foggy Winter’s evening following their last goodbyes!! Makes me cringe at the thought if they attempt to cross that road taking a right turn on a Friday pm when all the Aberdeen traffic are heading home for the weekend. Early afternoon onwards it starts.

#### CONCLUSION

12.1.1 Disagree.

12.1.2 Disagree.

12.1.3 How has this been backed up.

12.4 As a local resident, certainly do not agree with this statement “much needed development”. Happy with what we have!!

Elsie Greenhill

21st March 2022



Dear Ms Forsyth **Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)** Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022.

**I have taken an interest in this case as I regularly run on the country roads surrounding the proposed site and strongly feel that the roads are not suitable for the added volume of traffic. Further to my initial objection in which I mentioned this, I have noted the applicant's proposal of utilising an electric bus. These plans were added at the last minute and I do not think the plan to operate this shuttle is feasible due to the lack of connecting public transport, suitable lay bys and varying time of services.**

I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds: · There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required; · The required sequential approach has not been undertaken properly which should have included sites within Dundee; · The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use; · The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside; and · The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues. For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused. Yours sincerely. Euan Rose

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/full-dmrc-4-22  
**Date:** 13 March 2022 21:37:59

---

**From:**

Name: Elaine brown  
Address: an ceardach, kellas, dd5 3pd  
Date: 13th March 2022

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11<sup>th</sup> March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

As I walk these roads with a young child and pram it is dangerous enough as it is without more vehicles on the road. I have recently requested pavements be installed around kellas and the school and this has been knocked back by the council so the need to walk on roads is very real so the less vehicles on these roads the better. The approval of this application and the increase of traffic would just be an accident waiting to happen.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies.

Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Elaine brown

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune Application no. 20/00830/FULL-DMRC-4-22  
**Date:** 22 March 2022 14:32:20  
**Attachments:** [Summary Appeal Response Letter E Delaney-McNeill.docx](#)  
**Importance:** High

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Dear Sarah

Please find attached my summary appeal response confirming my objections to the application as previously stated.

Kind Regards  
Elaine Delaney-McNeill

Sent from [Mail](#) for Windows

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**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:02:29 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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**From:**

Name: Elaine Delaney-McNeill

Address: Mid Cottage, Drumsturdy Road, Broughty Ferry, Dundee, DD5 3NX

Date: 21 March 2022

**To:**

Ms S Forsyth

Communities Officer

Angus House

Orchardbank Business Park

Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)****Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11<sup>th</sup> March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues
- Further there are serious environmental implications for cremation as it requires large amounts of natural gas and produces significant amounts of CO2 into the atmosphere neither of which advance our efforts to decarbonise, halt global warming and promote greener methods for living and dying.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Elaine Delaney-McNeill

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Duntrune Crematorium Review Appeal  
**Date:** 13 March 2022 11:13:56

---

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE  
Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the above mentioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022 . I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and a new crematorium soon to supply North Fife.
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues *I live on the cusp of Murroes bridge which has a constant problem with flooding, 2 lorries cannot pass each other so pull up on top of our verge or driveway to allow passage and only 2 days ago 2 low loaders with JCB plant got wedged . We have numerous times been pushed out of the way by these monsters which are moving the jcb's for the sea green energy cables, I hardly think that's a dignified passage to ones final exit. Also the stables keeps horses at the farm stables behind us as well as the main buildings and daily these horses are lead across the bridge to be turned out into the fields to graze and returned at night. Our road is constantly used as a rat run from Drumsturdy Rd to the north for lorries from the Quarry and others that can not turn right at the junction at the end of Drumsturdy road to Kellas.*

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible

Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Many thanks

Yours sincerely.

**Kenneth and Fiona Freshwater**

Fiona Freshwater

Ardfern

Murroes

Dundee

DD53PB





**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 22 March 2022 13:07:48

---

Sarah,

I wish my original representation , to be considered again at the review board.

Thrust this is suffice .

Regards

Frank J Esposito.

Ardwyn House

Murroes

DD5 3PB

---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** 11 March 2022 19:03  
**To:** Undisclosed recipients:  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune  
**Importance:** High

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents

related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 25 March 2022 12:15:50  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Hi Sarah,

I'd like to confirm my original objection to the below application. Since the original objection, we have moved address and now reside at Immeriach, Murroes, DD5 3PA.

We use the local roads daily and pass where the proposed crematorium will be situated.

It's clear already that the infrastructure is at capacity. And although relatively quiet in terms of number of vehicles, we always have to use unofficial lay-bys and field entrances to allow traffic to pass safely. Increased traffic in the area would only worsen this issue.

Regards,

Greg Gardiner

On 11 Mar 2022, at 19:03, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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email to make such representations. **These should be sent directly to me.**

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I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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Flat 1 Duntrune House  
Duntrune  
Dundee  
DD4 0PJ

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

25/3/22

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and  
Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022. I fully support the refusal of the application and would like to take this opportunity to lodge some further personal comments to the original 10 objections I lodged on 4<sup>th</sup> January, 28<sup>th</sup> February, 13<sup>th</sup> May, 2<sup>nd</sup> July, 1<sup>st</sup> October, 12<sup>th</sup> October, 20<sup>th</sup> October & 14<sup>th</sup> December 2021 and 11<sup>th</sup> & 20<sup>th</sup> January 2022 and to the detailed appeal submission I lodged on 23<sup>rd</sup> March 2022.

**I would like to respond to the specific points from the Appellant's appeal statement as follows:**

**1. Executive Summary**

**Point 1.5:** 'the lack of choice of cremation facilities is prejudicing Angus residents'

Response: As I have repeatedly pointed out there is more than sufficient choice of cremation facilities and capacity within the local area and this is about to be supplemented by the new Brewsterwells Crematorium which is opening in Fife in early April 2022.

**Point 1.6:** 'no impact on neighbouring properties'

Response: This is clearly untrue, given that the nearest property is just 27m away from the boundary of the proposed site and the residents there and in the other nearby properties would be subjected to a significant increase in road vehicle traffic and the associated pollution as a consequence of this development. There is also a loss of their residential amenity and privacy, as they would no longer be living in a peaceful rural environment but would, in effect, have an industrial facility operating in their midst with over 127 car parking spaces and significant amounts of vehicle movements taking place on an hourly basis.

**Point 1.7.1:** 'is a need for the proposed development which will have economic benefits for the Angus community'

Response: regarding the claimed need for a further crematorium within Angus please see both my comment immediately above in response to point 1.5 and the current and future capacity analyses that I have previously submitted. There remains no independently proven need for this development and the motivation behind this application is purely and simply one of personal commercial gain for the appellant. In terms of any benefits to the Angus community from a 2<sup>nd</sup> crematorium within the council area – this would only be in the very short term from the construction work, as due to the constrained [inelastic] demand for cremation services, there would merely be a displacement of demand from the other local crematoria to the proposed development, which would result in no net long term employment gain.

**Point 1.7.2:** 'the use is not suitable for a town or edge of centre location'

Response: whilst I accept that a city/town centre location would not be appropriate for a facility such as this, an edge of town location on an existing transport corridor would be a very appropriate and accessible location. An excellent recent example of a local well positioned and accessible rural crematorium is that of Baldarroch Crematorium near Banchory which opened in 2016 and is located just 150m off the main A93 transport corridor between Aberdeen and Royal Deeside. If Angus was ever to require another crematorium, which it does not either now nor in the foreseeable future need as previously detailed, then an accessible location similar to that at Baldarroch should be found.

**Point 1.7.3:** 'there are no sequentially preferable sites available'

Response: I do not accept this claim, as the sequential search provided by the appellant is very superficial and does not cover all potential sites within Angus and none within Dundee (which clearly this facility is being positioned to primarily service).

**Point 1.7.4:** 'the application site is accessible by public transport.....'

Response: this is patently untrue. Please see Dougall Baillie Associates numerous comments on this subject, not least in Appendix 1 of the detailed appeal response that I have already submitted. Regarding the 'private electric vehicle collection service' mentioned by the appellant – given there are no existing bus pull ins in the immediate vicinity of the proposed site, collecting and dropping passengers at the existing bus stops would just introduce a new hazard onto an already extremely stressed local road network.

**Point 1.7.5:** 'no detrimental impacts on the natural, built or cultural environment...'

Response: I fail to see how a modern building, 127 space car park with associated roadways and external building and car park lighting will not be detrimental to the natural and visual environment. In terms of the negative impact on residential amenity please see my comments in response to Point 1.6 above.

**Point 1.7.6:** 'the proposal accords with all relevant development plan policies...'

Response: Again, this is patently untrue as can be seen by even the most casual glance over the Handling Report, as this proposal breaches planning policies at all of the national, regional and local levels.

## 2. The Applicant

**Point 2.3:** 'the applicant requires to diversify to remain viable'

Response: the appellant and his family wholly own and therefore have controlling interests in 4 companies registered with Companies House which, according to the latest sets of accounts filed there, have a combined Current Asset Value of £2,610,593 and a Total Net Asset Value of £1,051,146. It is therefore clear that the appellant is not struggling financially and that his existing businesses are all solvent, viable trading entities with a substantial asset base.

## 3. Site and Surrounding Area

**Point 3.4:** 'It has good transport links to the surrounding area and beyond via both the A90....'

Response: Please see Dougall Baillie Associates' numerous comments to the contrary. In addition, the roads linking the proposed site to the A90 include a single width section at Burnside of Duntrune Bridge, as well as the narrow, twisty and steep road up Burnside of Duntrune Hill and the well known difficult crossovers and hence dangerous junctions where the 'C' class roads meet the A90 at Shielhill/Inveraldie and at Tealing.

## 4. The Proposed Development

**Point 4.4:** 'the proposals will be completely screened from the west round to the east...'

Response: As can be seen from the photograph immediately below the site is highly visible and quite prominent on the local skyline and the limited planting proposed by the appellant is not going to completely screen clear views from afar of a floodlit building and car park. On winter afternoons the facility would be an inappropriate and out of keeping 'beacon of light' in the local rural landscape.



Regarding the 'memorial garden', it should be noted that this is, according to the supplied site drawings just a 'memorial wall', which again feels completely incongruent and inappropriate in a rural setting such as this.

## **5. Determination of the Application:**

**Point 5.3.5:** ‘...the loss of a comparatively small area of non-prime land’

Response: The land in question is currently zoned for agricultural use only. The land is perfectly capable of being successfully farmed, as it was up until just 4 years ago.

**Point 5.3.10:** ‘the Council’s Road Service is satisfied that the traffic from the development can be accommodated with the local road network...’

Response: This is a false claim as it is clear from the Roads Service final response dated 14<sup>th</sup> December 2021 that they are no longer satisfied in this regard as they have highlighted 3 junctions (U315/B978, U315/C4 and C4/B978) which are substandard from a visibility splay perspective and through which they would not wish to see an increase in traffic volumes as:

*‘The intensification of use of a sub-standard junction by concentrated levels of new traffic is undesirable and has the potential to be detrimental to road safety.’*

Moreover, given the recent spate of 6 serious car accidents in just a 33 day period on the approach roads to and from the proposed site and on which I have already provided further details in my previous submissions, local residents such as myself are fully entitled to hold the view that the local roads around the proposed site are not safe, are already extremely stressed and that adding additional high volumes of traffic unfamiliar with these roads is just inviting more accidents to happen. Please note that these accidents occurred during periods of lockdown with less traffic than usual using the roads, so the accident rate is potentially even higher than this in normal circumstances. Local residents, particularly walkers such as myself, live in genuine fear of being innocent victims of a road traffic accident and the recent accident statistics give this likelihood even greater credence.

## **6. Tayplan Policies 1 and 2**

**Point 6.3:** ‘...siting and design of the development, it will not lead to suburbanisation.’

Response: I fail to see how the widening of the C4 immediately in front of the proposed development site, the creation of passing places on the U315, the building of a significant sized building with 127 car parking spaces and external lighting is not suburbanisation of a currently entirely rural site. If granted planning approval, it would no doubt be the start of a ‘slippery slope’ of further planning applications being lodged to develop the surrounding land, as a further 90 acres of adjacent land is in the ownership of a trust controlled by the appellant’s parents.

**Point 6.4:** ‘...the proposal will meet local needs’

Response: I have already commented extensively on this false claim, as have the independent crematorium location specialists ‘The CDS Group’ in their report on this proposal which I have previously submitted so I will not repeat myself here other than to say that no such case has been satisfactorily made by the appellant.



**Point 6.5:** ‘.....encourage competition and result in reduced prices’.

Response: Please see the already submitted CMA’s Summary Final and Dundee University’s Reports into the funeral market and ‘funeral poverty’ respectively for a detailed analysis of the somewhat unique funeral market. These reports, and the Ministry of Justice’s full acceptance of the recommendations of the CMA’s report, demonstrate without a shadow of doubt that the correct strategy to address ‘funeral poverty’ is through the already implemented transparency of pricing and the potential introduction, post pandemic, of price controls.

**Point 6.6.3:** CMA report (Document D47)

Response: As has been previously pointed out, the CMA document supplied and referred to by the appellant is actually the initial consultation document and not the final report, nor is it the Ministry of Justice’s response to the latter. It is, in my opinion, somewhat disingenuous and misleading to submit and present the initial consultation document as being the final viewpoint/outcome reached, which is what the appellant appears to have done here.

To prove this point, the covering page of Document D47 [the CMA’s initial consultation document supplied by the appellant] contains the following text to position it within the wider data gathering, analysis and reporting process:

‘This is one of a series of consultative working papers which will be published during the course of the investigation. This paper should be read alongside the [Issues Statement](#) published on 8 April 2019 and other working papers published.

These papers do not form the inquiry group’s provisional decision report. The group is carrying forward its information-gathering and analysis work and will proceed to prepare its provisional decision report, which is currently scheduled for publication in April/May 2020, taking into consideration responses to the consultation on the Issues Statement and responses to the working papers as well as other submissions made to us.

**Points 6.6.4 to 6.6.7:** re the CMA’s Funeral Market and Dundee University’s ‘funeral poverty’ reports and the claimed need for an additional crematorium in Angus.

Response: I have already commented extensively on these subjects and proved that the appellant’s arguments do not stand up to the even the lightest of economic scrutiny.

**Point 6.7:** ‘the new crematorium near St Andrews will not provide any competition to either the Dundee crematorium or to the appeal proposals’

Response: Given that Dundee crematorium currently draws business from north and east Fife (the exact amount is commercially sensitive) I fail to see how the opening of the Brewsterwells crematorium near St Andrews will not take a significant amount of business away from Dundee’s crematorium (thereby increasing its available capacity). With all respect to Dundee’s crematorium, from the perspective of those bereaved families living in north and east Fife, it is located over the River Tay in a different geographical area, on the northern side of the city requiring a lengthy trip around the city centre to reach it and is located next to an industrial estate.

**Points 6.8 & 6.9:** ‘....demonstrates a specific local need....’ and ‘a qualitative and quantitative need has been established’.

Response: Again, please see my previous responses within this letter and my earlier submissions which completely disprove these claims.

## 7. LDP Policy DS1

**Point 7.3:** ‘...the proposal is to serve a local need for a crematorium in Angus’.

Response: Please see my response immediately above.

## 8. LDP Policy DS2

**Point 8.2:** ‘this is not a large scale development which will generate significant traffic movements’

Response: I consider that a building capable of seating 120 people with 127 car parking spaces represents a ‘large scale development’. Furthermore, with potentially 400 additional vehicle movements per day on the C4 road immediately in front of the proposed site equating to a 55% uplift in vehicle movements (please see my detailed response dated 23<sup>rd</sup> March 2022 for the calculations behind this) this uplift in traffic movements cannot realistically be described as anything other than being ‘significant’.

**Point 8.2.1:** ‘accessible to existing or proposed public transport networks’

Response: Please see the Handling Report and Dougall Baillie Associates’ numerous comments on this subject. It is clear that this site is not by any means ‘accessible’ and that the appellant’s attempts to claim otherwise are just paying lip service to the national, regional and local policies seeking to promote sustainable developments.

**Point 8.2.3:** ‘..the crematorium’s private electric vehicle will take passengers to the door of the building from a greater distance as required’.

Response: Please see my response to Point 1.7.4 above.

**Point 8.2.6:** ‘Applicant will provide 5No new passing places on the Kellas Road’ & the Roads Service responses

Response: No drawing has been supplied showing any new passing places on the Kellas Road (B978). The only passing place drawings supplied by the applicant relate to the U315 and C4 roads.

Regarding the number of Roads Service responses – these have proved necessary as the appellant’s TA contained incorrect visibility splay drawings (at the U315/B978 and U315/C4 junctions in particular) and, regrettably, local residents had to engage at their own expense a transportation consultant (Dougall Baillie Associates) to ensure that the correct factual information was presented to the planning officer considering this application. This does not equate in any way to ‘the Roads Service being unduly influenced by the repeated pressure from third parties to change its position’ but does equate to the poor quality of the due diligence carried out by the appellant’s professional advisers.

Regarding the apparent proposal by the appellant to reduce the speed limit on the 60mph stretch of the Kellas Road to 40 mph to suit his commercial aims, may I respectfully remind him that council and national roads policies are not rewritten just to suit the needs of one individual.

## 11. Statutory Consultations

**Point 11.9:** 'the need was highlighted by members of the community in letters of support, but has been ignored by the Community Council'

Response: When reviewing the 722 unique objections and 82 supportive comments lodged before the initial determination of this application two things were abundantly clear:

- 1) When looking at the numbers of objectors compared to supporters living within a 2km radius of the proposed site, the facts are 460 objectors compared to 6 supporters. I think it is therefore crystal clear as to what the view of local residents is with respect to this proposal and hence that the Community Council, which has a duty to communicate to the relevant bodies the local opinion on matters such as planning applications, were absolutely correct in adopting a position of objection to this application - to do anything else would have been a dereliction of their duty.
- 2) Of the 82 supporters, the single largest geographical group (25 in number) resided in either Friockheim or Arbroath and I doubt that this is a coincidence, given that the appellant's business address is in the former location and one of his 4 businesses operates principally from the latter location.

It is indeed curious that residents of Friockheim and Arbroath, who already have Parkgrove crematorium operating on their doorstep, would be so keen to support the development of another crematorium a considerable distance away from where they reside and which they would be unlikely to use themselves, given the very close proximity to them of an existing facility.

It is also interesting to note that the 2<sup>nd</sup> largest geographical group of supporters (7 in number) reside in London - I think it somewhat unlikely that they would be using a crematorium located so far away.

In terms of the local reaction to news of the appeal being lodged, at the time of writing, in just the limited 14 day appeal response period available, over 400 appeal response letters have already been submitted to Angus Council with local residents re-confirming their objections. It is therefore clear that the local feeling towards this proposal has only hardened and hence the Community Council continues to reflect the local majority view which is one of complete opposition to this proposal.

**Point 11.10:** '...pressure was also put on the Community Council by the third party objectors..'

Response: This is a complete misrepresentation by the appellant of events and in fact the reverse is true as I understand that the appellant's agent repeatedly demanded a private and non-constitutionally compliant meeting with the Community Council, at which the agent stated he would speak but not accept any questions from the floor i.e. he wanted to lecture the local community, but not give them any opportunity to question or challenge his proposition. This is not how local democracy works and as such I, on behalf of the STOP Duntrune Crematorium (SDC) campaign, declined to participate in such a session as I understand the Murroes & Wellbank Community Council also did. When SDC and I did engage with the Community Council as part of their regular meetings we were always open to receiving questions/challenges from both sides of this argument and were happy to fully abide by the rules of the Community Council's constitution at all times.

### Third Party Representations

**Point 11.13:** '...Angus Council continues to accept objections .....after the statutory period for objection is over'.

Response: It should be noted that Angus Council also continues to accept *supportive* comments after the statutory period for *comment* is over, and indeed a reasonable number of the 89 supportive comments were lodged *after* the statutory 21 day consultation period had ended and several of these were from the same individuals, hence *skewing the figures*. I also doubt that it was a coincidence that the now appellant lodged the original planning application on virtually the last working day of 2020, which meant that the statutory 21 day consultation period ran right over the 2020/21 festive period when a) local residents would be busy/distracted by the events of the season and b) professional advisers that the local community might wish to engage to advise them would be unavailable due to the extended holiday period.

**Point 11.14:** '...many of the objections are in a standard form....'

Response: Given the complexity of the application, the timing of the start of the statutory 21 consultation period as detailed immediately above and the desire to focus on the material facts of the matter to avoid wasting the planning officer's time, SDC offered local residents the use of a template objection letter if they so wished. Some chose to make their own submissions, but many were extremely grateful that someone had 'cut to the chase' for them and they were hence happy to complete such a template letter, affix their own stamp to it and post in their objection to this proposal. Just because some individuals have chosen to use a standard objection letter to lodge a succinct, meaningful and material objection does not diminish the strength of their feeling about this proposal nor affect the validity of their submission and to suggest otherwise is both disrespectful and unacceptable. Please note that for the accuracy of the public record, prepaid envelopes were not provided by SDC and people were not stopped in the street and asked to object to the application. Even if these alleged activities had taken place they would have been perfectly legal and hence it is curious as to why the appellant has chosen to erroneously make these statements/claims.

**Point 11.15:** apparently spurious objections lodged with Angus Council

Response: Document D51 [supplied by the appellant] contains a copy of a redacted (by the appellant) letter from Angus Council notifying an unknown recipient of the decision to refuse the planning application - please note that it is not a letter acknowledging the receipt of comment from an interested party. So, this letter [Document D51] could have been received by either an objector or by a *supporter* of the proposition and prior to receiving this letter the recipient should also have received from Angus Council a letter acknowledging receipt of their original comments. I am therefore curious as to why the recipient has apparently chosen to raise this matter now.

Regarding an objection being submitted in the name of Fraser MacKenzie, the then planning officer responsible for processing this application, please note that a) it was not the standard template letter as utilised by SDC and b) it would serve SDC no benefit to submit such a letter. It would seem that Angus Council's submission moderation process does not extend to checking that the submitter is not the planning officer responsible for the planning application in question, so I would humbly suggest that this is something that Angus Council might like to take a look at and implement a process change to prevent a similar reoccurrence in the future.

Regarding the thinly veiled accusation that some of the objections lodged were somehow fraudulent - such wild and false claims reveal more than a whiff of desperation from the appellant and his 'professional' advisers.

**Point 11.16:** ‘...the Roads Service changed their position in light of continued pressure...’

Response: Please see my response to Point 8.2.6 above.

**Point 11.24:** ‘...there is already public transport passing the site and another bus operators has agreed to divert its existing service to also pass the site’

Response: Please see Dougall Baillie Associates’ comments on the unsuitability and impracticality of the twice daily school buses being used by mourners to attend a cremation service. Regarding the claim of an agreement with one of the two local bus operators to divert their very infrequent service by the proposed site, please note that from Item D45 [supplied by the appellant], that Xplore Dundee have only said that this is something they are open to considering – this is somewhat different from a firm commitment to change their routes, as is being claimed by the appellant.

## **12. Conclusion**

**Point 12.1.1:** ‘...there is a need for the proposed development...’

Response: Please see my earlier responses to Points 1.7.1, 6.4, 6.6.3, 6.6.4 to 6.6.7, 6.7, 6.8, 6.9, 7.3 & 11.9.

**Point 12.1.2:** ‘...the use is not suitable for a town or edge of centre location’

Response: Please see my earlier response to Point 1.7.2

**Point 12.1.3:** ‘...there are no sequentially preferable sites available’

Response: Please see my earlier response to Point 1.7.3

**Point 12.1.4:** ‘...the application site is accessible by a variety of modes of transport...’

Response: Please see my earlier response to Points 1.7.4, 3.4, 8.2.1 & 11.2.4

**Point 12.1.5:** ‘...no detrimental impacts on the natural, built or cultural environment nor on residential amenity’

Response: Please see my earlier responses to Points 1.6, 1.7.5 & 8.2

**Point 12.4:** ‘...the officer’s refusal of planning permission for the development requires to be set aside...’

Response: There is no material reason given within the appeal statement, which is just a rehash/repackaging of the contents of the original planning application, that I believe would justify this action. If the original delegated decision were to be overturned, it would, in my opinion, set the alarming precedent that national, regional and local planning policies are not worth the paper that they are written on and call into the question the value of the process of developing and using such policies as a rigorous and fair way to assess planning applications.

### Closing comments

There is no need for the proposed crematorium, with both existing facilities at Dundee and Friockheim having sufficient current and future capacity.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent for this development continues to be refused.

Yours sincerely,

Ian Robertson

IJohnston  
3 Pitairlie Road  
Newbigging  
By Dundee  
DD5 3RH

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE  
Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and  
Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022. I remain an objector to the proposal. The previous objection I submitted was *bone fide*. No further documentation or proposal adjustments have been submitted to address the material considerations I raised.

I am outraged that my concerns as a close neighbour of the site and a road user are not *per se* relevant in the opinion of Brodies LLP or indeed the applicant. The numerous objections lodged reflect concerns raised by the local residents and road users. Many of the comments lodged that I have read are from the Murroes area and the equestrian community. The concerns are valid and are based upon real time experiences under various road conditions.

I believe the appeal document prepared by Brodies LLP are opinions of bias and not of fact. To illustrate, I reiterate that the 'as-is' traffic capture was based on information gathered during the October Angus School Holiday period 2019. The roads are always quieter around Duntrune at this time not only because Murroes School is closed but also many residents and road users take time off for child care and holiday. I consider the survey data misleading and unusable. In addition, the ongoing pandemic has significantly changed traffic volume and flow as well as a significant increase in walkers, runners and cyclists around the Duntrune route. No acknowledgement of these changes have been made as an addendum in this report. The traffic data does not stand up to scrutiny.

To conclude *that the development will have no detrimental impacts on the natural, built or cultural environment nor or residential amenity* is not robust. The conservative estimate of 24 cars to and from the services X 3 per day, amounting to 144 journeys notwithstanding the shuttle cars for bus passengers cannot be without impact.

The proposed site is visible from Drumsturdy Road and Kellas Road.

I trust that you will consider planning policy, the suitability of the locale, current infrastructure, ROAD SAFETY, pollution and also wildlife preservation in the review,

Kind Regards,

Imogen Johnston

a



Ms S Forsyth,  
Communities Officer,  
Angus House.  
Orchardbank Business Park.  
Forfar  
ANGUS  
DD8 1AE

12 Hawthorn Grove,  
Balllumbie Castle Estate,  
Broughty Ferry,  
Angus  
DD53NA

14<sup>th</sup> March 2022

Dear Ms Forsyth,

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the above application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022.

I continue to fully support the refusal of the application for the reasons set out in my original objection submissions to Angus Council Planning and the refusal notice dated the 24th January 2022 . I therefore take this opportunity to re-confirm my objection to the proposed development on the following grounds:

There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required.

The facility would likely attract a large proportion of business from Dundee District and I believe the required sequential approach has not been properly undertaken as it should have included sites within Dundee.

The proposed site is not, and cannot, be made accessible by all modes of transport, resulting in an increased reliance on car access via the surrounding rural road network. This will inevitably result in a significant increase in traffic forced onto unsuitable roads, known to have serious safety issues and a history of regular vehicle accidents.

Myself and numerous other objectors have made it clear that the development is also wholly inappropriate and incongruous within this unspoilt rural area and will have a detrimental impact on the rural landscape, resulting in suburbanisation and industrialisation of the countryside.

For the above reasons I believe the proposal does not comply with Scottish Planning Policy and numerous local planning policies such as TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, DS2: Accessible Development, DS3: Design Quality and Placemaking and the Angus Local Development Plan 2016

These policies are rightly in place to protect and preserve our country environment and amenities. Nothing the applicant has submitted provides sufficient justification to set aside any of these policies and the proposed development is an industrial and commercial operation that will add no value to the local economy.

Therefore, I would request in the strongest possible terms that the Planning Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

John Barr

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

I would appreciate acknowledgment of receipt of this email.

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL - DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification. **I fully support the refusal** of the application for the reasons set out in the refusal notice dated the 24th January 2022 and iterate my earlier objection to the proposal, on each and all of the following grounds:

- There is no reasonably demonstrated need for the proposed crematorium, with both existing regional and local facilities at Dundee and Friockheim having sufficient capacity if needed. There is thus no business case illustrating need
- The required sequential approach has not been undertaken properly which should have included sites within Dundee. This demonstrates a failure in process
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in substantially increased reliance on the car
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to an escalation of very real road traffic safety issues on a road where many accidents occur, and where pedestrian locomotion is already difficult and unsafe, as is cycling or horse riding
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside

The applicant's appeal does nothing remotely significant enough to address the refusal of the original application. Further, nothing the appellant has submitted provides any sound rationale to set aside the policies mentioned in my next paragraph.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016.

Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning **consent is refused**.

Yours sincerely,

Jennifer Olivier

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/FULL-4-22  
**Date:** 15 March 2022 17:47:42

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From Name: Jacqueline and Darren Dawson

Address: Eastmost Cottage, Kellas Road, Kellas, Dundee DD5 3PD

Date: 15 March 2022

To: Ms S Forsyth, Communities Officer, Angus House, Orchardbank Business Park, Forfar, DD8 1AE

Dear Ms Forsyth

Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)

Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022.

I fully support the REFUSAL of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting in the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues
- I have concerns that the appellant is not being sincere when he notes in his appeal that he intends to only have three cremations per day during off-peak times. As he is a businessman wishing to diversify, this is not a good business model. I believe if this build goes ahead the appellant will seek to maximise the potential number of cremations per day to make the business viable, thus creating significant levels of traffic on these local unclassified and substandard roads on a daily basis.

For the above reasons I consider that the proposal does not comply with Scottish Planning

Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely  
Jacqueline and Darren Dawson

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 23 March 2022 21:56:22

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Dear Madam,

I am writing to confirm my ongoing objection to the proposed Crematorium near to Duntrune House which was refused planning permission.

I understand that an appeal has been lodged for further consideration.

Having given further consideration myself to the proposal and looked at the site over the past couple of months, I am even more convinced that it would be wholly inappropriate to grant this proposal.

The grounds for which it was refused were in my opinion entirely competent and remain so.

The significant number of objectors have made it clear that people genuinely care about the area and the negative impact this proposal is very likely to have on a beautiful part of Angus. I have a vested interest as I use this road both as a runner and driver and do not believe this rural road with poor public transport is suitable.

The site itself is near to an awkward corner and I foresee problems, particularly with larger funerals. Should cars need to park on the relatively narrow windy road, this will increase risk to safety of Road Users, given the layout of the road from the corner to the east, as it travels westwards over the brow of a small incline, into a dark part of the road with overhanging trees.

The road has had to cope with the addition of Ballumbie Castle Estate nearby, sharing the road with local farm traffic, school traffic, as well as residents from Angus and north Dundee using it as an alternative route to bypass main arterial routes.

The proposal is so close to the boundary with Dundee it is reasonable to assume that it will likely benefit residents of Dundee as much if not more than those actually in Angus. I am unconvinced that it is likely to bring any significant business to Angus, nor indeed employment to Angus residents.

It therefore would be a site built on green land in an area of natural beauty, against the wishes of a significant local population in Angus whilst servicing the neighbouring city a couple of hundred metres next door.

I would ask anyone considering this proposal to travel there and look for themselves if they have not already. Park your car and walk along the road for a few minutes. It will not take long to imagine how this proposal would adversely affect the area.

I hope the Development Management Review Committee remain circumspect to the reality of this proposal, a proposal with likely little benefit to Angus, to the detriment of the local population.

Yours Faithfully

Jamie Allen

On 11 March 2022 at 19:02 Sarah Forsyth <ForsythSL@angus.gov.uk>  
wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review

Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/FULL-4-22  
**Date:** 21 March 2022 12:37:53

---

From Name:  
John Dowdles

Address:  
17 Robert Street  
Newport-on-Tay  
DD68BJ  
Fife

Date:  
21/03/22

To:  
Ms S Forsyth, Communities Officer, Angus House, Orchardbank Business Park, Forfar, DD8 1AE

Dear Ms Forsyth

Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)

Foreword:

Before I drop the copy I've been sent to share, I'd like to state I'm not a bot, just a concerned family member of an affected local given an appropriate list of information that I've read through and agreed with, as many hundreds of other concerned parties are.

Having grown up in this area all my life, I'm aware of its dangerous traffic and congestion issues. This is not an area that's suitable for any form of development, especially any producing fumes, and will only stand to devalue and erode the local environment. I understand the need for a crematorium somewhere in Dundee, but I'm positive better locations exist further away from residential areas in and around Dundee.

Continuing with copy:

Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022.

I fully support the REFUSAL of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting in the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues



For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

John Dowdles

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application No 20/00830/FULL - DMRC-4-22  
**Date:** 14 March 2022 20:12:31

---

*Dear ,*  
*we wish to reiterate our concern regarding the siting of the proposed crematorium complex including car parking and approach. The access roads are secondary and several miles from a main arterial road. Consequently there will be occasions where there is a considerable build up in traffic which could well be problematic. Considerable large agricultural activity uses nearby roads throughout the year which could cause backing up of traffic at bottle necks. In Winter, ice and snow could disrupt traffic flow. There is presently adequate provision at Dundee Crematorium and also Froickheim. Please relay these comments which we feel are highly relevant to the appropriate review committee.*  
*Many thanks.*  
*Yours sincerely,*  
*John and Ann Steer.*

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 00:02:30  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Dear Sarah

I strongly protest this application and would like my comments to be taken into consideration.

I have grave concerns about the volume of traffic on these narrow roads which were never designed for the current use of traffic let alone what can be added by large amounts of people at a Crematorium. Over the years there's been many accidents in this area and I can only see matters increasing due a higher usage. None of us purchased our homes with the view of a crematorium being so close by and also how this could depreciate the value of our homes.

This would bring chaos to surrounding areas with people all leaving at the one time!

I strongly contest this application.

Best regards  
Karen Lesslie

Sent from my iPhone

On 11 Mar 2022, at 19:12, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you

if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/full-dmrc-4-22  
**Date:** 13 March 2022 21:29:20

---

**From:**

Name: kevin brown  
Address: an CEARDACH, Kellas, dd5 3PD  
Date: 13th march 2022

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11<sup>th</sup> March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

The road network is not of a standard for the vehicles that are already on it, let alone more. As a keen walker and cyclist it would concern me having a larger number of vehicles on these roads.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies.

Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Sent from my iPhone

With regards to above planning review which I received notification on 11/3/22 I continue to fully support the decision to refuse the original application and take this opportunity to very strongly voice my thoughts

1. There is, as already has been conveyed NO capacity issues within existing facilities in Tayside
2. The proposed site has no suitable infrastructure to allow a variety of transport modes to be utilised, roads are too narrow as it stands with no pavement access available, bus service is practically non-existent
3. Development of this nature is inappropriate for rural area
4. Sequential approach has not been taken to look at alternative more appropriate sites

This application for above reasons does not comply with Scottish Planning Policy, LDP nor does it comply with TAYplan policy - within this policy it states "reduce the need for car-based travel and encourage walking, cycling and public transport usage, this is only one part of the policy that will not comply. The applicant has not submitted any justifiable reasons to set aside the above policies. So myself and my husband as local residents would request that the decision to refuse planning be upheld

Yours sincerely  
Lynne and Bill Emslie  
Willow Cottage  
Parklands of Murroes

Sent from my iPad

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application No 20/00830/FULL-DMRC-4-22 Response to Planning Application Appeal - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 15:07:16  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL\\_dated\\_24\\_January\\_2022.PDF](#)

---

**From:**

Name: Ms Lesley A Burnett  
Address: 16 Oak Loan, Ballumbie Castle Estate, Dundee DD5 3UQ  
Date: 16th March 2022

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11<sup>th</sup> March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required.
- The required sequential approach has not been undertaken properly which should have included sites within Dundee based upon a full feasibility study encompassing both Angus and Dundee council area requirements.
- The proposed site is well known to me not just because I live so close by, but I have used and I continue to use the road leading up to the site as my daily commute to and from work for the last 25 years in all weathers. The road is extremely narrow and is in poor repair. It is treacherous not just during the snow and ice of winter given the altitude of the site, but given the agricultural land on either side of the road it is subject to significant mud and earth overspill during harvest times. In terms of the volume of traffic, current traffic is already at saturation point and includes cars, farm vehicles, trucks from the haulage business in Murroes and the daily single decker school busses. From daily experience the road is not wide enough for existing cars and these larger vehicles to pass each other without having to stop and pull over. I cannot imagine how the proposed deluge of crematorium traffic could do anything other than add to this congestion and the risk of accidents. The fact the the proposed developer has suggested that electric cars providing a shuttle service would solve this problem is illogical. A car is a car, adding to the physical congestion regardless of its fuel source. I would conclude that this development site is not and cannot be made accessible by a varying the modes of



transport E.g. adding a bus stop and the only end result will be a significantly increased number of vehicles on a substandard, narrow road which is already unfit for purpose.

- The site itself sits on top of an exposed hill and as such, during the winter months when unfortunately the number of daily funerals is at its highest point, it will cause chaos for those attending the Crematorium to even manage to get there safely. The road from Burnside of Duntrune and from the south of the site are both subject to ice and snow, and are not gritted or cleared. If you had the choice of selecting any piece of ground for such a development the last place it would fit well is on top of a hill up a substandard narrow road which is already accident prone. Given the need for all planning to be fully cognisant of the needs of people with disabilities then again this makes no sense at all.
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside.
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to a significant increase in very real road traffic safety issues for commuters, children and the disabled. Given the congestion already present on the roads approaching the site and the frequent need to pull over and even reverse back to accommodate oncoming traffic, I can't imagine how a hearse full of family mourners would feel if they had to do this on the way to the funeral of their loved one. Just makes no sense at all.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Lesley A Burnett

16 Oak Loan

DD5 3UQ

On 11 Mar 2022, at 19:10, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** ref Planning Appeal 20/00830/FULL-DMRC-4-22  
**Date:** 23 March 2022 19:55:50  
**Attachments:** [Westhall objection following appeal.docxv2.docx](#)

---

Dear Ms Forsyth,

Please find attached my appeal response letter regarding the Duntrune Crematorium Planning Appeal 20/00830/FULL-DMRC-4-22.

Yours faithfully,

Lillias Greenhill  
Westhall Farm,  
Kellas,  
Dundee  
DD5 3PD

Westhall Farm  
Kellas  
Dundee  
DD5 3PD  
19/03/22

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and  
Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022. I fully support the refusal of the application and would like to take this opportunity to lodge further comments to the original objections I lodged on 6<sup>th</sup> January, 26<sup>th</sup> October and 15<sup>th</sup> December 2021.

**Farming and living in this area**

**Summary of previous points made:**

- The combination of slow moving funeral corteges and mourners coming into contact with huge agricultural vehicles on narrow twisty roads presents a risk which needs to be avoided.
- At busy times these large agricultural vehicles are under pressure of time. The increased traffic on inappropriate roads will hinder work and create unnecessary frustration increasing the chance of accidents.
- No spontaneous traffic survey can accurately predict the seasonal nature of farm traffic. The submitted survey did not account for this variability rendering it inaccurate.

**In response to the following points from the Appellant's Statement of appeal:**

**Point 2.3** ...the Applicant requires to diversify to remain viable

**Point 2.5** ...the Applicant has been in discussions with an established crematoria operator which will run the facility.

**Response:**

This seems to imply the Crematorium is a means of diversification. Selling the land and passing the running of the Crematorium to another operator cannot be described as diversification.

**Point 3.3** ...Class 3:2 with a small area of Class 3:1 and is therefore not classed as prime agricultural ground.

The field is difficult to combine /plough due to the slope and has been in set aside for approximately 4 years.

**Response:**

According to the Scottish Government's website 'www.soils.environment.gov.scot', 3:2 / 3:1 is the classification of all the surrounding area - which is farmed successfully, including an adjacent field located just to the east of the proposed site, which has a similar gradient, is part of the same inter-connected upland formation (known as the Duntrune and Glack Hills) and is ploughed and combined annually.

The applicant is clearly trying to undervalue his farm land to strengthen the case for taking it out of production.

**Roads - Summary of previous points made:****C4 by Westhall Farm**

- 18.8% of traffic (from applicant's TA) is predicted to use this road which is at its narrowest only 3.7m wide.
- As the most direct route to some hospitality venues this estimate is likely to be an underestimation of the volume of traffic.
- The junctions at either end i.e. U315/C4 and C4/B978 have been identified (from applicant's TA) as problem junctions.
- Evidence and pictures of recent accidents at the corner to the east of the site and at the junction C4/U315 were submitted in my previous objection (6<sup>th</sup> January 2021).

**Unclassified U315/C4**

- The requirement for passing places identifies how unsuitable this road is for the anticipated increase in traffic. Furthermore, the passing places would not accommodate the large agricultural vehicles which regularly use this road.
- Twice in the last three years this road has been blocked by snow for up to a week. As the main route to the proposed crematorium, funeral processions would have been unable to reach this site and even if the road were cleared of snow by a snowplough, the proposed passing places would then be full of compacted snow and hence rendered unusable until the eventual melt.

**Revision of the visibility sightlines**

- There will be no permission given by us for any work to take place on our land to provide the revised visibility sightlines now required at either the U315/B978 or the U315/C4 (west of Westhall) junctions.

**Accessibility of the proposed site:**

The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use. Lack of public transport options forces an over reliance on private cars along these unsuitable roads, creating very real safety issues. The

Appellant's proposed solutions – school buses, buses covering limited settlements at irregular times are not feasible options. Scant detail and lack of logistics around the provision of an electric vehicle show this as an unrealistic proposition.

**Loss of amenity to locals and visitors**

Siting a suburban feature out of keeping with this attractive rural setting and creating traffic, noise and light pollution will result in suburbanisation of the countryside. It is wholly inappropriate and damaging to both wildlife and those who enjoy the countryside. There are more appropriate sites out-with this green space. The required sequential approach has not been undertaken properly which should have also included sites within Dundee.

**Closing comments**

There is no need for the proposed crematorium, with both existing facilities at Dundee and Friockheim having sufficient current and future capacity.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Lillias Greenhill

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Proposed crematorium site.  
**Date:** 23 March 2022 23:36:18

---

Good evening.

I again propose against this.

The extra traffic and pollution this will cause to family, friends, birdlife and wildlife. Idyllic village and surrounding areas where people look for solace to enjoy fresh air and peaceful roads, will become unfairly and permanently disrupted.

I truly question how anyone who truly knows this area of such beauty could even consider this.

I urge you once more to decline this proposal.

The negative impact on the daily life and mental health of so many will be irreparable.

Many thanks.

Lisa Carnegie.

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Duntrune Crematorium Planning Appeal  
**Date:** 23 March 2022 18:31:25

---

Dear Sarah

In addition to my earlier representation, I would like to say that the local roads are inadequate to service this application.

We already have an incinerator on our doorstep at Baldovie, an additional incinerator in our local area would further spoil our air quality.

Kind regards  
Loretta Cruickshank



**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 25 March 2022 14:30:12  
**Attachments:** [Road to Proposed Crematorium access.odt](#)

---

Dear Ms Forsyth,

I write in response to the appeal against refusal of planning permission for a crematorium at Burnside of Duntrune.

My sympathy is with the applicant and the situation in which he and his business find themselves, and I respect the careful case he and his representatives have made for this development, as there is an undoubted need for the kind of facility asked for somewhere in the area.

It is a pity that the standard of public discussion on the matter seems to have been somewhat diminished as described in the appeal statement, but nonetheless, it is the foundation of democracy that people may come together and seek to influence each other's views in establishing public policy.

However, having read the appeal statement I remain of the view that the development, however carefully designed and executed, will significantly detract from the traditional and long-standing agricultural and rural residential uses of this unique and special small part of Angus county.

I attach photos of the roads which access the proposed site, and use them to support my view that they are best suited for use by road-users familiar with them, or going about recreational exploration.

The occasional introduction of significant numbers to very rural roadways more reminiscent of an orienteering challenge rather than the normal ease of access to a necessary public facility has the potential to cause frustration both with mourners and regular passers-by.

I can't see how any adjustment to the local bus services is likely to fit in with any arrangements made at the proposed crematorium, so essentially the facility would only be accessible by personal or chartered transport.

I am not convinced that a more suitable site cannot be found at a town edge location: the cemetery at Pitkerro Grove, whilst outside the county, is a very good solution to that particular need, and could easily be emulated by Angus if a developer came forward with a suitable proposal.

In summary, therefore, it is with regret that I repeat my view that however beneficial the project might be to the applicant and his potential employees, it would not be appropriate for the historic environmental setting of this application.

Yours sincerely,

Malcolm Roderick

Road to Proposed Crematorium access coming from West



Road to proposed Crematorium access coming from East



**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application No: 20/00830/FULL-4-22  
**Date:** 24 March 2022 22:23:04  
**Attachments:** [Appeal Response.March 2022.pdf](#)  
**Importance:** High

---

Dear Ms Forsyth,

Please find attached Appeal Response Letter as requested within 14 days from your notification email dated 11 March 2022.

Kind regards,

Marilyn Mauran  
West Cottage  
Westhall Feus  
Kellas  
By Broughty Ferry  
Dundee  
DD5 3PD

**Tel:** [REDACTED]

**Mob:** [REDACTED]

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Please carry out virus and such other checks as you consider appropriate.

**From:**

Mrs Marilyn Mauran  
West Cottage  
Westhall Feus  
Kellas  
Dundee DD5 3PD

24 March 2022

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11<sup>th</sup> March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

There is no need for the proposed crematorium as both existing facilities at Dundee and Friockheim are not used to full capacity even with the current Covid situation. To state that they are more expensive than the national average is not a factor for allowing planning permission.

The development site is not and cannot be made accessible by a variety of modes of transport. To state that a new bus stop could be provided at the entrance does not make sense as there are no regular bus services.

The applicant also states that 127 car parking spaces will be provided but they only estimate that each service may generate on average 24 cars?

All the roads leading to the proposed site are too dangerous for pedestrians.

To say it would be acceptable in relation to noise, air quality and odour control is unbelievable as the extra traffic alone would increase all of these elements.

Regarding the visibility splays and the comment to reduce the 60mph section on the B978 Kellas Road to 40mph or 30mph – well, good luck with that as the vast majority of HGVs, vans, cars and the occasional bus drivers either cannot read the signs or choose to ignore them as they even drive through the 30mph sections at 40, 50 and 60mph.

The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting in the suburbanisation of the countryside.

The applicant states as the land is on a slope it makes it difficult to use for farming. They seemed to use it for agriculture for many years without any problem. Of course farmers were required to set aside some land for the sake of wildlife and the government would give them a payment for doing this and hence the reason it was not used anymore?

The applicant's legal representative states:

'The family also owns Fleming Butchers (Arbroath)' and 'contributes to the local community etc..

Why is any of this relevant to the application?

While I appreciate sometimes farmers have to diversify there are better ways of doing it than putting a crematorium in the countryside.

Under the present circumstances with the ongoing war in Ukraine by Russia it is vital that we in the UK keep all the farmland we have so we can grow our own crops without having to rely on other countries.

**Therefore, in view of this letter and my previous Letter of Objection dated 04 January 2021, I request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.**

Yours sincerely,

A solid black rectangular box redacting the signature of Marilyn Mauran.

Marilyn Mauran

**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:Sarah.Forsyth@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 12 March 2022 16:57:50

---

Hi Sarah,

Thank you for your email. I am delighted the council has refused this application and wish to say that I agree wholeheartedly with the reasons for their decision and stand by my original objection,

Thank you,  
Marilyn

---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** 11 March 2022 19:10  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSI@angus.gov.uk](mailto:ForsythSI@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 23 March 2022 12:11:13

---

Hello and thankyou for your email.

I wish to confirm that I wholly support Angus Council's refusal of planning for the crematorium near Duntrune House.

The roads in this area are wholly unsuitable for the volume of traffic that would be generated by the crematorium. We will see an unwelcome increase in traffic in the near future since planning has been passed for the new golf resort at Forbes of Kingennie without the addition of a crematorium.

Mr Batchelor has suggested that a bus stop would make the crematorium accessible for public transport, clearly displaying his lack of local knowledge being that there is no current bus route passing the proposed site; the infrequent bus service which passes through Burnside of Duntrune then turns left for Westhall Terrace. The narrow, twisting road passing the site is wholly unsuitable for buses: the arching trees which grow on both sides of the road passing Duntrune House scrape along the sides and roofs of the school buses which have no choice but to use the route, and the trees would make access by double deckers (which are often used on the route through Burnside of Duntrune) impossible. The T junction at the bottom of the road (where you turn left for Kellas and right for Dundee) is at a very awkward angle meaning the school bus has to take up both lanes of both the road it is exiting and the fast, busy road it is entering to turn left. It would be suicidal to create this route into a regular bus service. Buses passing through Burnside of Duntrune regularly meet large vehicles on the bend by the pond, including, very regularly the Monifieth High school bus, meaning the bus has to reverse with passengers on board, an already undesirable situation which does not require to be compounded further by additional buses, never mind the vast increase of private cars that would be attending funerals. I can just picture the altogether undignified situation of a hearse and funeral car meeting a heavily loaded tractor and trailer / a double decker bus / a lorry etc as they negotiate the bend by the pond creating mayhem; the road has a steep drop to one side into a field with only a few feeble fence posts at the road side.

Walkers and cyclists continue to regularly use the roads in this area, a situation that should be encouraged, not made more unsafe by more vehicles. There are no pavements and walkers safety should not be further compromised. Mr Batchelor's suggestion that the crematorium would provide electric cars to collect mourners is preposterous; this would still increase the volume of cars on the roads, electric vehicles are very quiet and pose a greater danger to walkers on roads with blind bends. A proposal such as this would make no business sense: how would you know how many cars you would need?, the cost of electricity is becoming prohibitive and presumably Mr Batchelor would not be providing the service free; there are plenty taxi companies that any mourner could use for presumably as competitive a rate as Mr Batchelor could offer; this suggestion is merely a nod to the fashion for paying lip service to environmental issues.

Mr Batchelor has said that he has thought very hard about what would be a suitable use for this field. May I suggest that he has thought long and hard about what would extract the greatest amount of money from the site with no thought for the local community. Mr Batchelor does not live in the area and a crematorium there will have no negative impact on his daily life. He says he requires to diversify to make his farming business sustainable. Both the farms which border the site are run by families who have also farmed for generations and they have not abused this responsibility by seeking to take the easy way out. Angus farmland is some of the most fertile in Scotland and should not be sacrificed on the whim of a greedy landowner. The current political and environmental climate makes it more apparent than ever that we should be utilising our farmland wisely, growing crops as

close to home as possible.

Any need for a new crematorium could easily be met by building in Dundee; the wasteland beside the new 'Road to nowhere' beside Struans Toyota garage, just off the Forfar road would be ideal: perfect for accessing by bus, convenient for both Dundee and Angus residents, directly beside the main artery road passing through Dundee with no need to pass through residential areas, ample room to create a car park, could easily be landscaped to create a garden of remembrance while keeping the crematorium building itself (which are rarely things of beauty) close to other city buildings rather than tarnishing an unspoilt area of countryside.

I trust that Angus Council will do the right thing by local communities.

Kind regards,

Marion Joss

On Fri, 11 Mar 2022, 19:06 Sarah Forsyth, <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** 20/00830/FULL-DMRC-4-22  
**Date:** 21 March 2022 09:17:05

---

Dear Sarah,

I would like to add my voice to the strong community objection regarding the application to build a crematorium on land, in a field, adjacent to my home. Such a development would destroy a beautiful rural location much used by walkers, cyclists, and locals. This would also fly in the face of local planning policies, as the council have already indicated in previous planning committee meetings.

Thank you for your help in this regard,

Yours,

Paul Dixon.

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** ref "Application no. 20/00830/FULL-DMRC-4-22  
**Date:** 21 March 2022 22:30:03

---

Name: pierre bernard

Address: 5 langlands road, Forfar

Date: 21/03/22

To:

Ms S Forsyth

Communities Officer

Angus House

Orchardbank Business Park

Forfar DD8 1AE

Dear Ms Forsyth

Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)

Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies.

Furthermore the applicant states the both crematoria in Dundee and Froickheim are amongst the dearest in the country as a recently bereaved person I can assure you the cost of cremation was not a consideration for the location chosen. Whilst this may be a consideration for some it certainly was not for my family and I believe

this would be the case for the majority of people.

I feel that the applicant also seems to be saying that households should only be allowed to put in one application objection however surly every individual should be given freedom of thought and allowed to object as an individual if they chose. All objections should be counted individually even if there are multiple from the same household as long as they are from individually named people.

Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely.

Pierre bernard

Sent from my iPhone

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** ref "Application no. 20/00830/FULL-DMRC-4-22  
**Date:** 25 March 2022 10:00:49

---

From: Roger Wallace  
Address: 3 Middleton Farm Cottages  
Dundee  
DD4 0PQ  
Date: 25th March 2022

To:  
Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)

Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and

the proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

This is a beautiful part of the countryside that should be preserved for cyclists and walkers etc please protect this area rather than make it busier and more dangerous

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies.

Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely.

Roger Wallace



[Sent from Yahoo Mail on Android](#)



**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Ref: 20/00830/FULL – DMRC-4-22  
**Date:** 15 March 2022 20:18:31  
**Attachments:** [594e54fc-7e4e-479d-923c-0a66d3d0a0cf.jpg](#)

---

From:

Rose Brodie  
4 Burnside of Duntrune, By Dundee, Angus, DD4 0PF.

15/3/2022

To:

Ms S Forsyth  
Legal & Democratic Services  
Angus Council  
Angus House  
Orchardbank  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)**

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal.

I have lived in Burnside of Duntrune for 39 years. I regularly walk on these rural roads, often passing by the proposed crematorium site. I encounter many vehicles trying to pass in opposite directions while avoiding foot traffic. It is very hazardous for both drivers, and even more worryingly for pedestrians. The area is rural and agricultural. In other words, this is a working production environment. Of necessity, large farm vehicles are therefore often on these (substandard) roads, as are large lorries from local haulage and construction related businesses and delivery traffic. This is a traffic and working environment where substantial numbers of funeral vehicles would exacerbate already difficult conditions, to the point of being unsafe.

Referencing the Protection of Badgers Act 1992 as amended by the Wildlife and Natural Environment (Scotland) Act 2011, Nature Scotland points out that both badgers and their setts are protected in Scotland. This is relevant to the site of the proposed crematorium as this area is already in use by badgers - and road traffic in the area is already a hazard to these creatures\*. The applicant has not provided adequate (or any) proposals to foster the well being of badgers, or shown how the proposed development would do this. An

omission which, if anything, indicates that the proposal will negatively impact this species and other local wildlife such as deer, goshawks, and small mammals.

\*The danger of the nearby road and the proximity of the local badger population is well indicated by this photograph taken only yards from the proposed site 4/7/2021 -



Further:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting in the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

For ALL the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Rose Brodie.

**From: Professor Stephen Olivier, Main Wing, Duntrune House, DD4 0PJ**

**To:**

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

I would predicate acknowledgment of receipt of this email.

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at  
Land North East of Duntrune House, Duntrune**

I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification. **I fully support the refusal** of the application for the reasons set out in the refusal notice dated the 24<sup>th</sup> January 2022 and iterate my earlier objection to the proposal, on each and all of the following grounds:

- There is no reasonably demonstrated need for the proposed crematorium, with both existing regional and local facilities at Dundee and Frickheim having sufficient capacity if needed. There is thus no business case illustrating need
- The required sequential approach has not been undertaken properly which should have included sites within Dundee. This demonstrates a failure in process
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in substantially increased reliance on the car
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to an escalation of very real road traffic safety issues on a road where many accidents occur, and where pedestrian locomotion is already difficult and unsafe, as is cycling or horse riding
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside

The applicant's appeal does nothing remotely significant enough to address the refusal of the original application. Further, nothing the appellant has submitted provides any sound rationale to set aside the policies mentioned in my next paragraph.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016.


Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning **consent is refused**.

Yours sincerely.

Professor Steve Olivier  
Principal and Vice-Chancellor  
Robert Gordon University  
Garthdee House  
Garthdee Road  
Aberdeen  
AB10 7QB

Tel: 01224 262001

Sent from my iPad

**From:**   
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 21 March 2022 09:15:52  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Good evening,

I am writing to confirm that I still wish to reject this proposal.

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

My name is Scott McBride  
87 SilverBirch Drive, Angus, DD5 3NS

20/03/2022

I firstly wish to address the applicants comments that because we used (I didn't personally) a standard letter template that that in some way should be disregarded. Everybody I have spoken with are very much against this for a number of reasons.

My objection probably goes along with the main reasons highlighted by others but I wish to discuss them below.

My main reason for objection is that I find the road network to be completely unfit for purpose for a development such as this. If I'm honest, the road network is poor even for current usage and there has been a number of road accidents and many more near misses over this past year.

I also feel that there are many sites that would offer better road and public transport opportunities. This site has below basic public transport which is unacceptable. This will encourage more car traffic and not in line with promoting green transport.

I wish to further highlight that the fumes from the site would reduce the air quality of the area. This proposal also brings urbanisation to a rural location. From what I gather, there is no requirement for this given there is capacity in DUNDEE and Angus for services.

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the

Review currently under consideration is dismissed and planning consent is refused.

Many thanks,

Scott

Sent from my iPhone

On 11 Mar 2022, at 19:06, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

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The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other

documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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Flat 1 Duntrune House  
Duntrune  
Dundee  
DD4 0PJ

Ms Sarah Forsyth  
Legal & Democratic Services  
Angus Council  
Angus House  
Orchardbank,  
Forfar. DD8 1AN  
Delivered by email:

24<sup>th</sup> March 2022

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL-DMRC-4-22 (Alternative ref:22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and  
Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the above-mentioned Application for Review, lodged on the 1<sup>st</sup> March 2022 and on behalf of myself and the STOP Duntrune Crematorium (SDC) campaign group submit the following response to the Local Review Board.

STOP Duntrune Crematorium comprises 35 local residents, including myself, all of whom live in close proximity to the development site and therefore would be the most impacted by the proposal should it gain planning approval. I have maintained my objection to the current proposal in the strongest possible terms since the original planning application submission. I, along with many other local residents, have also lodged a number of representations during the consideration of the planning application all of which remain relevant to the current appeal and I respectfully request that the Members of the Local Review Board consider all previous representations in their consideration of the current Review.

SDC and I fully endorse the refusal of the planning application for the reasons set out in the refusal notice dated 24<sup>th</sup> January 2022.

In response to the appellants' Statement of Appeal, SDC and I would make the following comments under the following subject headings :



## **1. Executive Summary**

As confirmed by the appellants, all planning decisions are made on the balance of competing policies and material considerations. In the current case the Planning Service very carefully considered all relevant matters and, on clear matters of policy, refused the application. We fully endorse this decision and respectfully request that, after consideration of all facts, the Local Review Body uphold this decision, dismiss the review and refuse planning permission.

The appellants make comment that the decision maker cannot be swayed by the volume of apparent objections. However, carefully considered objections which contain material grounds for objection are relevant in the decision-making process. While the level of local objections is not material, it is a very clear indicator of the strength of public opposition to the proposal.

The appellants make the comment that there is no specific policy which relates to the location of crematoria in Angus. However, we would direct the Members of the Review Body to Policy TC9 Safeguard of Land for Cemetery Use which reserves land in various settlements for cemetery use. It is wholly reasonable to assume that had a specific need for an additional crematorium been identified, this would have been highlighted within the ALDP, however no such requirement was identified by Angus Council.

The appellants consider that the cost of a cremation is a legitimate material consideration in the determination of the current appeal. We submit it is not, the cost of a funeral is a business decision and, as will be demonstrated within this response, does not reflect a lack of supply.

## **2. The Applicant**

No comment

## **3. Site and Surrounding area**

The appellants take pains to describe the surrounding area, but fail to consider in sufficient detail the surrounding roads network. The surrounding roads are narrow, winding rural roads which regularly accommodate heavy agricultural traffic. A detailed assessment of the surrounding roads and junctions has been undertaken by Dougall Baillie Associates, please see Appendix 1 to this response, which provides a summary of the roads/access issues in the vicinity of the proposed development site and the key observations of the expert roads consultants are as follows:

- The location of the development would lead to it becoming a wholly car accessed development. There are no footway connections or convenient public transport access which is against policy.
- The proposed public transport options are infrequent and thus unsuitable to serve a significant travel generating development such as a crematorium where people would wish a regular bus service.

- The local road network is narrow and unsuitable for the increase in traffic associated with the proposed development.
- The development intensifies the use of junctions, which the applicant's TA notes to have substandard visibility. Unless improved (with suspensive conditions) this represents a clear safety risk for all road users.

There is a history of accidents in the area which is acknowledged by Angus Council Roads Service. The addition of approximately 200 cars per day, based on 5 services per day x average of 40 cars per service all making journeys in and out of the premises (so an additional 400 vehicle movements per day), I would submit is a realistic estimate of the likely uplift in the traffic volumes, based on an analysis of the cremation schedules at the other two local crematoria, and this along with the queues of slow-moving funeral traffic will clearly result in real road traffic concerns for the existing residents.

#### **4. Proposed Development**

The development includes the development of a large new modern building to accommodate services and the ancillary functions including the disposal of bodies. It further includes the provision of 127 parking spaces on site. Without question the introduction of the new development will have an impact on the visual amenity of the area, and will be wholly incongruous in the rural setting.

The appeal statement considers the immediate views of the site, but has not considered the long views into the site from the surrounding viewpoints. No detailed Landscape and Visual Impact Assessment has been lodged in support for the proposal. It is clear that the building and large expanse of car parking, coupled with the light pollution from the inevitable (for safety reasons) external lighting for the building and car park, will be visible from some distance and will have a detrimental impact on the attractive rural location and will contribute to the suburbanisation of the countryside.

#### **5. Determination of The Application**

The appellant appears to question the Planning Services' ability to weigh the planning policies and material considerations and is selective in the quotes provided to demonstrate this point. As confirmed in the conclusion of the Report of Handling:

"While the proposal may be compatible with some aspects of relevant policy, it is **contrary to SPP, TAYplan and the ALDP for reasons related to accessibility.** A facility of this nature should be provided at a location with good accessibility for all sections of the community, and not just those can or wish to travel by private car. Account has been had for all matters raised in support and objection to the application, but there are no material considerations which justify approval of planning permission contrary to the provisions of the development plan."

The appellant makes the comment that the proposal complies with a number of relevant development plan policies, however the proposal fails to comply with many fundamental policies of Scottish Planning Policy, TAYplan and The Angus Local Development Plan 2016, specifically TAYplan Policies 1 and 2 and Policies DS1, DS2, Accessibility, DS3 and TC8 of the ALDP 2016. Nothing the appellant has provided offers sufficient justification to set aside adherence with these policies.

Our specific concerns with the proposal will be considered as part of the Development Plan section below.

## 6. TAYplan

Policy 1 Location Priorities – The Principal Settlement Hierarchy focuses the majority of development in the region's principal settlements with strategies, plans and programmes prioritising land release with the priority on the reuse of previously developed land and buildings thereafter a range of sites is made available within principal settlements or on the edge of principal settlements.

Proposals for development in the countryside should be assessed against the need to avoid suburbanisation of the countryside and unsustainable patterns of travel and development.

Response:

The current site is within a countryside location and does not relate to any settlement. It is clear that the site does not benefit from good public transport links, nor are there safe cycle or pedestrian links, therefore the proposal will undoubtedly result in "unsustainable patterns of travel and development".

In terms of the sequential approach, the appellants have assessed a number of sites in Angus and dismissed these as unacceptable, including a number of greenfield sites within settlement boundaries. However, given the proximity of the appeal site to Dundee and the fact that the proposed crematorium will no doubt primarily serve the much larger population of Dundee, it is only fair and reasonable that the appellant considers sites within Dundee. They have not done this and therefore, in our opinion, have not completed the required sequential test.

The appellant attempts to justify the need for a crematorium in this remote location quoting the cost of a cremation in Dundee and Frickheim. The cost of a cremation service is a business decision and will be dependent on local costs and local demand. Detailed supporting information was submitted as part of our original representations and we would respectfully request that information is considered as part of the determination of the current proposal. We note that the appellant refers to a Competition & Markets Authority (CMA) Funeral Market Investigation *Consultative Paper* (Item D47 dated 30/1/20), but we ask the Local Review Board members to note that this is not the *Final Report* which was issued later that same year. A copy of the summary *Final Report* can be found in Appendix 2 of this response.

We have previously provided information from the CMA's Funeral Market Investigation **Final Report** (dated 18/12/20) which confirms that *'When it comes to choosing a funeral, customers (including the least well-off) are insensitive to price' [Competitive Assessment: Point 10]*

The Report went on:

*'When it comes to choosing a crematorium, most customers do so on the basis of location (how close the crematorium is to where the deceased lived) or familiarity (whether they have been there before). Again, price is rarely a relevant factor in their choice, and, although quality matters to customers in general, very few customers compare alternative crematoria.'* [Competitive Assessment: Point 11].

The other key conclusions were that price transparency and price control were identified by the CMA as the best and most appropriate ways to address 'funeral poverty'. The first of these changes became a legal requirement in September 2021 as all funeral directors in the UK now have to display/provide a full breakdown of the costs of organising a cremation (incl of the actual cremation itself). If this change proves insufficient to address 'funeral poverty' the CMA also indicated that, after the COVID pandemic has passed, that they will consider introducing price controls (as has recently been implemented in the domestic energy market) as their next step.

It is also worth noting that in March 2021 the UK Government accepted in full the findings of the CMA's **Final Report** [please see Appendix 3 for the Ministry of Justice's Response to the CMA's Funeral Market Report].

In addition, a Report on Funeral Poverty in Dundee (July 2019) [please Appendix 4 for a copy of this] confirmed that due to the 'unique [inelastic] nature of the demand for funeral services, normal market competition rules do not apply and the introduction of new service providers would merely result in a redistribution of the existing demand'. The Report further stated that 'market competition in this environment is what many would understand to be a zero sum game.' [2nd paragraph of Section 2.4: The Funeral Market].

Furthermore, taking the CMA findings that 800-1000 cremations per year are required for a crematorium to be viable, the appellants' statement that only 3 services would be held per day, equating to approx. 750 per year is simply not a credible or viable business, especially when the significant capital investment costs of building a new crematorium have to be recovered.

As demonstrated within the earlier objections, at the present time there is capacity at both Dundee (currently operating at 70% capacity) and Friockheim (currently operating at 50% capacity) to accommodate further cremations and as such there is no "need" for a further local crematorium. Looking to the future, as previously submitted, according to the predicted death statistics within the National Records of Scotland document [summary-ca-angus-18\_NRS.xlsx], by mid 2027/28 there is only predicted to be a increase of 124 deaths per annum compared to the baseline of 2018. As only 68.5% of deaths result in cremation [source 'The Cremation Society: Progress of Cremation in the British Islands 1885-2019'], this only equates to a growth in demand of 85

additional cremations a year by mid 2028. Given the current excess capacity (50%) at Parkgrove Crematorium in Friockheim, the existing facility can easily accommodate this modest increase in demand. There is therefore no credible 'growth in demand' justification for another crematorium in Angus.

Crematoria are private enterprises, as would be the proposed development, so there is no certainty or guarantee that an additional crematorium at Duntrune would result in reduced cost for a service.

Even if it were accepted that there is a need for an additional crematorium in the area, which it is not, it would not justify locating a community use in an area with no access to public transport or cycle/walking links.

Policy 2 Shaping Better Quality Places – Seeks to deliver better quality development and places which respond to climate change. Part B looks to achieve Active and Healthy by Design.

Response:

The current proposal is clearly contrary to Policy 2 as it introduces new development in a remote rural area, the site is not integrated with existing community infrastructure and, as there are no public transport or cycle/footpath linkages, will increase the need to travel by car.

## **7. Angus Local Development Plan (ALDP)**

Policy DS1: Development Boundaries and Priorities – Confirms the focus of development will be sites allocated or otherwise identified for development within the Angus Local Development Plan, which will be safeguarded for the use(s) set out. Proposals for alternative uses will only be acceptable if they do not undermine the provision of a range of sites to meet the development needs of the plan area.

Outwith development boundaries proposals will be supported where they are of a scale and nature appropriate to their location and where they are in accordance with relevant policies of the ALDP.

Development of greenfield sites (with the exception of sites allocated, identified or considered appropriate for development by policies in the ALDP) will only be supported where there are no suitable and available brownfield sites capable of accommodating the proposed development.

Response:

In the current circumstances, it is submitted that the introduction of a large modern building along with the required expanse of parking is not of an appropriate scale and nature to this rural area. Further, and as will be demonstrated, that proposed development does not comply with all relevant policies of the ALDP.

Therefore, the proposal is contrary to Policy DS1 and no material considerations have been provided to set aside this policy.

Policy DS2: Accessible Development – Development proposals will require to demonstrate, according to scale, type and location, that they:

- are or can be made accessible to existing or proposed public transport networks;
- make provision for suitably located public transport infrastructure such as bus stops, shelters, lay-bys, turning areas which minimise walking distances;
- allow easy access for people with restricted mobility;
- provide and/or enhance safe and pleasant paths for walking and cycling which are suitable for use by all, and link existing and proposed path networks; and
- are located where there is adequate local road network capacity or where capacity can be made available.

Response:

In terms of the accessibility of the site to existing or proposed public transport networks, the appeal site is in a remote rural location and is not on a bus route, the closest bus stop being 450m metres away. The appellant has suggested that the local school bus service can be used; this is a very limited service operating just at the beginning and end of the school day, Monday to Friday only and not in school holidays and will not provide the convenient and reliable public transport access to the site. Further, it is wholly inappropriate to suggest that mourners would be prepared to share the bus with school children. The appellants further suggest that the local bus operators would be prepared to extend the existing services. While there is no guarantee of this, and only one of the two local bus operators has apparently indicated any interest in diverting their service by the proposed site, the existing services, the 22 and 139 serve only Kirriemuir and Tealing respectively and not any other population centres in Angus, operate infrequently providing on average a 3-hourly service in and out of Dundee, therefore again neither can provide a reliable and accessible service, as was also highlighted by the Roads Service. Of the one local bus operator (Xplore Dundee) that has provided some comment, it is worth noting that they only operate 2 inbound services to Dundee per day and just 1 outbound service (and the latter only goes via Burnside of Duntrune and Westhall Terrace on a 'request' basis). *[Please see Appendix 5 for the timetables for the 22 and 139 services].*

The Report of Handling also made clear that should a community facility such as this be built, it should be located at a *'site which is (or can be made) easily accessible by a choice of transport such as those on established transport corridors served by regular public transport services'*. It is clear that the proposed site is neither on *'an established transport corridor'* nor *'served by regular public transport services'*.

The site is not connected to safe well-lit footpath and cycle links, nor can it be.

Therefore, it is clear that the site is not accessible, it does not provide access to public transport, allow easy access for people with restricted mobility, it cannot provide safe and pleasant paths for walking and cycling which are suitable for use by all or link existing and proposed path networks.

In terms of traffic movement, the appellant has tried to suggest that the proposed development will not generate "significant traffic movements". Firstly, it is important to take cognisance of the character of the area and the surrounding roads network. The area is wholly rural in character and served by minor, winding rural roads with substandard junctions offering limited visibility. The roads currently experience high levels of heavy agricultural traffic associated with the surrounding farms. Please refer to Appendix 1: Letter from Dougall Baillie Associates which provides an overview of the surrounding roads network.

The appellant then suggests that the proposed crematorium will provide 3 services per day attracting around 24 cars each, a total of 144 additional cars moving in and out of the site in any one day. We submit that this is a vast underestimation. From our investigations an average crematorium provides around 5 services per day, the suggested 3 services would simply not be viable for this proposed business. The proposal can accommodate 120 people taking an average of 40 cars per service and this equates to approximately an additional 200 cars per day moving in and out of the site, therefore a total of 400 additional car movements per day. This will be further compounded by the funeral cortege introducing slow moving lines of traffic. By any description this equates to a "significant traffic movement" within this rural area which, on the basis of the above 400 additional car movements per day, equates to a 55% uplift in traffic volume using the section of the C4 road directly in front of the proposed crematorium. [This % uplift is derived from dividing the 2000 additional car movements per week (400 per day x 5 days per week) by the Monday-Friday total baseline of 3615 existing vehicle movements which is taken directly from the applicant's Transportation Assessment dated September 2021]. This level of additional cars must further be considered in the context of the surrounding local roads which, as has been evidenced and can be seen on a site visit, are poor quality, narrow winding rural roads accessed by a number of substandard junctions. The surrounding area has a history of road accidents. The addition of a significant level of additional cars, funeral corteges, and visitors who do not know the local roads will undoubtedly lead to road traffic safety concerns.

During the consideration of the planning application the Roads Service, as they are legitimately entitled and indeed expected to do as an independent public service, reviewed all submitted information, including information provided by Dougall Baillie Associates on behalf of SDC and myself. On the evidence provided, and after careful consideration they, and again quite legitimately, amended their advice.

For the appellant to suggest that the Roads Service had somehow been “unduly influenced” questions the integrity, independence and professionalism of the Roads Service and is quite simply unfounded and unacceptable.

Therefore, it is clear that the proposed development does not comply with Policy DS2.

Policy DS3: Design Quality and Placemaking – Requires that development proposals deliver a high design standard and draw upon those aspects of landscape or townscape that contribute positively to the character and sense of place of the area in which they are to be located. Development proposals should create buildings and places which are:

- **Distinct in Character and Identity:** Where development fits with the character and pattern of development in the surrounding area, provides a coherent structure of streets, spaces and buildings and retains and sensitively integrates important townscape and landscape features.

Response:

The current proposal for a modern crematorium with associated large expanse of car parking is wholly out of keeping within this rural area and in no way fits the rural character of the area.

- **Safe and Pleasant:** Where all buildings, public spaces and routes are designed to be accessible, safe and attractive, where public and private spaces are clearly defined and appropriate new areas of landscaping and open space are incorporated and linked to existing green space wherever possible.

Response:

As discussed above, the site is not accessible and as a result the use will increase reliance on cars generating significant levels of journeys by car and taxi.

- **Well Connected:** Where development connects pedestrians, cyclists and vehicles with the surrounding area and public transport, the access and parking requirements of the Roads Authority are met and the principles set out in ‘Designing Streets’ are addressed.

Response:

The site is not well connected. The site offers no access to a regular local bus service and there are no safe pedestrian and cycle routes.



- Adaptable: Where development is designed to support a mix of compatible uses and accommodate changing needs.

Response:

The proposal is for a stand-alone crematorium divorced from any existing settlement.

- Resource Efficient: Where development makes good use of existing resources and is sited and designed to minimise environmental impacts and maximise the use of local climate and landform.

Response:

The proposed use will result in development on greenfield site and is therefore not considered resource efficient.

Therefore, it is clear the proposal does not comply with Policy DS4.

Policy TC8 Community Facilities - Requires that new community facilities should be accessible and of an appropriate scale and nature for the location. In the towns of Angus, and where appropriate to the type of facility, a town centre first approach should be applied to identifying a suitable location.

Response:

Again, and as set out by the Planning Service within the Report of Handling the site is not accessible. Nothing lodged in support of the appeal has changed this fact. Further, the proposal introduces a modern building with large expanse of parking into a rural area and it is therefore submitted that the proposal is not of an appropriate scale and nature for the location.

Therefore, the proposal does not comply with Policy TC8.

Therefore, it is clear that the proposal does not comply with the Policies of the Angus Local Development Plan 2016.

## **8. Material Considerations**

### Need and Economic Benefits

As detailed within the various representations submitted to the planning application we submit that there is no need for the proposed crematorium in this location. From information received from the existing operating local crematoria it is apparent there is capacity with Froickheim, currently operating at only 50% and Dundee at 70% of

available capacity. As noted in the Handling Report there is a new crematorium currently under construction at Brewsterwells near St Andrews. This is due to open in early April 2022 [source: one of the co-owners, Mr Ian Sturrock of Sturrock, Comb & Davidson Funeral Directors]. This will take business from centres of population in Fife such as St Andrews, Cupar, Newport, Tayport and Wormit away from the crematorium at Dundee, thereby increasing the available capacity of the latter.

In addition, a report instructed by SDC and myself from the CDS Group, specialising in cemetery and crematorium location, design and management, assessed the drive times to the 2 existing and the proposed Duntrune crematoria concluding, based on the accepted 30-minute drive time, that the need for the proposed new crematorium has not been adequately demonstrated and the argument to build one is 'not cogent'.

The appellants also make much of the cost of funerals within the Angus/Dundee area, however evidence from the Competition and Markets Authority (CMA) Funeral Market Investigation **Final Report** (18/12/20), as previously stated, confirms that *'When it comes to choosing a funeral, customers (including the least well-off) are insensitive to price'*. [Competitive Assessment: Point 10]

*Further, 'When it comes to choosing a crematorium, most customers do so on the basis of location (how close the crematorium is to where the deceased lived) or familiarity (whether they have been there before). Again, price is rarely a relevant factor in their choice, and, although quality matters to customers in general, very few customers compare alternative crematoria.'* [Competitive Assessment: Point 11]

In addition, as previously stated, the Dundee University Report on Funeral Poverty in Dundee (July 2019) confirmed that due to the *'unique [inelastic] nature of the demand for funeral services, normal market competition rules do not apply and the introduction of new service providers would merely result in a redistribution of the existing demand'*. [2<sup>nd</sup> paragraph of Section 2.4: The Funeral Market]

We also note that this proposal is only for a partial and not a full cremation service offering, as there is only mention of a 'memorial wall' within the appellants' supporting documents and no mention of the inclusion of the facility to offer the internment of the deceased's ashes (something which is offered at both the Dundee and Parkgrove crematoria). Bereaved family members will therefore either have to leave these ashes with the facility for disposal or make their own arrangements to collect them. We therefore submit that a true 'like for like' comparison of the proposed Duntrune Crematorium with the existing service providers is not valid, as there is a major deficiency in the proposed service offering here, which is to the detriment of local bereaved families.

The appellant highlights the economic benefits from the construction works and 4 possible employees. It must be recognised that the construction costs will only bring short terms benefits and will bring little benefit to the local economy in the long term. In addition, due to the '*constrained [inelastic] nature of the demand for cremations*', the displacement of cremations from the 2 existing local crematoria to the proposed one at Duntrune could well result in a loss of employment at those facilities and would hence result in no net gain in local employment.

#### Scottish Planning Policy (SPP)

As confirmed by the Report of Handling, the Scottish Government are clear that:

*"in pressurised areas easily accessible from Scotland's cities and main towns, where ongoing development pressures are likely to continue, it is important to protect against an unsustainable growth in car-based commuting and the suburbanisation of the countryside."*

In the current circumstances it is clear that the proposed development of a community use, including large modern building and expanse of required parking within a rural area, will contribute of the suburbanisation of the countryside.

In terms of promoting sustainable transport and active travel, SPP indicates that:

*"planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car and where direct links to local facilities via walking and cycling networks are not available or cannot be made available; access to local facilities via public transport networks would involve walking more than 400m; or the transport assessment does not identify satisfactory ways of meeting sustainable transport requirements."*

The proposed use is clearly a significant travel generating use. The appellants estimate the number of car journey per funeral to be 24 x 3 funerals per day, totalling 144 in one day (cars have to enter and leave) in itself a significant level of car movements within this quiet rural area, however, we would dispute this figure. The proposed crematorium can accommodate 120 people, on an average attendance we would estimate 40 cars per service, at 5 services per day with cars accessing and entering the premises this equates to around 400 additional car movements per day, by any stretch a "significant travel generating use". However, when factoring in the context of the surrounding roads network which is characterised by narrow winding rural roads and contains at least 3, as accepted by the Roads Service, sub-standard junctions, this it is of significant concern.

Further, the site does not provide convenient links to public transport links, and while the appellants have suggested a new bus stop can be provided and the existing bus service could be extended, the current bus

service is extremely infrequent, with buses around 3-hourly on average. This would not provide the reliable, regular bus service needed to access this proposed community facility. Finally, the site does not and nor can it include safe well-lit footpath or cycle links.

Therefore, it is clear that the site is not accessible nor can it be made accessible and consequently the proposal is contrary to a main ambition of Scottish Planning Policy.

SPP also indicates that a sequential approach should be adopted for uses which generate significant footfall including community facilities. It requires that locations are considered in order of preference: town centres; edge of centre; other commercial centres identified in the development plan; and out of centre locations that are, or can be, made easily accessible by a choice of transport. The SPP indicates that:

*“it is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve.”*

It is submitted that the appellants have been selective in the sequential approach choosing sites only in Angus and in doing so dismissed greenfield sites within settlement boundaries. It is clear that the facility will primarily serve the much larger population of Dundee, therefore, the sequential approach should have included sites within Dundee, and it did not. Therefore, an appropriate sequential approach has not been completed.

Therefore, the current proposal is clearly contrary to Scottish Planning Policy.

#### Statutory Consultees

The Roads Service provided comments in respect of the road network and access, accidents, parking, pedestrian access, cycling access and public transport and responded to various submissions by the applicant and the third parties during the consideration of the application.

In making comment they recognised the rural nature of the roads network in the immediate vicinity of the development site confirming these to be being twisty and relatively narrow in some places.

The Roads Service highlighted the following concerns:

- Sightlines at the junction of the U315 and the B978 Kellas Road are currently substandard and are impeded by topography to the south west;
- Visibility at the C4/U315 and C4/B978 junctions is substandard, with the latter having a stop sign at its junction with the B978.

and their conclusions were:

- Visibility at U315/B978 junction requires improvement;
- Visibility at C4/U315 junction requires improvement.

All works to improve the junctions would be necessary prior to development, were planning permission to be granted. Improvements to the B978 would require physical works to alter the vertical alignment of the road and the work may affect land outwith the control of the applicant. The Roads Service further indicated that the intensification of use of sub-standard junctions by concentrated levels of new traffic is undesirable and has the potential to be detrimental to road safety.

The Roads Service further noted that there are no formal pedestrian or cycling links in the immediate vicinity of the site. In respect of public transport, it commented that given the location of the site and the fact that the existing public transport services are very low in frequency, the site is not readily accessible by sustainable means of transport. Further, the nature of the public road is such that it would not be desirable to encourage pedestrians to walk on a section of carriageway which is twisty, with changes in level, darkened by tree canopy, unlit, and with a verge with limited opportunities for harbourage by pedestrians to allow vehicles to pass. As such, it is not a route which the Roads Service would wish to see pedestrians walk from bus route to the crematorium facility.

It is clear that should planning consent be granted, a number of suspensive conditions would be required to ensure the necessary road and junction improvements were secured prior to the development commencing. However, much of the land to improve the junctions is outwith the appellants control, therefore there is no certainty that these essential junction improvements can be made. In order to address this issue, the appellants are simply looking to make an unspecified financial contribution to Angus Council, thus passing the responsibility to the Council to undertake the necessary works. However, the fact remains that neither the council nor the appellant can confirm ownership of the land over which the improvements will be necessary and therefore it is not certain whether the required works can be undertaken.

The appellant has failed to address these concerns and has rested on the Roads Service initial comments which have been superseded on the basis of further investigations. The appellant makes the comment that "if there are deficiencies at the junctions these are existing deficiencies in the roads network and are not caused by the development, which will add very little traffic to these junctions."

With respect, it is clear that the proposed development is a significant generator of traffic, this added to the existing rural roads which as described by the Roads Service are "twisty and relatively narrow" "with changes in level, darkened by tree canopy, unlit," without the necessary road junction improvements will result in a very real risk to road traffic safety.

### Third Party Representations

The level of third-party objections demonstrates the very clear level of opposition to the proposal within the local area. The representations were lodged by individual residents and included varying reasons for their opposition. Any comment on the veracity of these objections and any accusation that any representations were fraudulently submitted is absolutely refuted by SDC and myself.

All those who have made a comment to the original objection will have a further opportunity to make comment as part of the ongoing Review and SDC and I anticipate that the strength of local opposition will once again be clearly expressed.

### **9. Conclusion**

In conclusion and contrary to the appellants statement SDC and I would conclude:

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required;
- The required sequential approach has not been undertaken properly which should have included sites within Dundee;
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use;
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside;
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads will lead to very real road traffic safety issues;
- It is quite simply, the wrong location for a development such as this.

The proposal is contrary to the policies of Scottish Planning Policy, TAYPlan and The Angus Local Development Plan 2016. In summary SDC and I fully support the decision by the Planning Service to refuse planning permission for this development and urge the Local Review Board to continue to support and stand behind these policies and to endorse the decision of the Planning Service by dismissing the Review before them and also refuse planning permission.

Yours sincerely

Ian Robertson

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## Appendices

- 1) Dougall Baillie Associates response to appeal statement
- 2) CMA's Summary of the Final Report into the Funeral Market (December 2020)
- 3) Ministry of Justice's response to the CMA's Final Report into the Funeral Market (March 2021)
- 4) Dundee University's Report of their study of 'Funeral Poverty' (2019)
- 5) Local Bus Service Numbers 22 & 139 Timetables (current schedule)

CW/20231let06c

24 March 2022

**Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune Planning Application - 20/00830/FULL-DRMC-4-22  
Response to Application for Review - Ref - 22/00004/REFUSE**

## **Introduction**

This document is in response to the application for review of the above noted development. DBA were appointed to provide specialist transportation advice to Ian Robertson and the STOP Duntrune Crematorium campaign group on the transportation documents submitted by the applicant and the responses from Angus Council Roads Service on these matters. This document provides a summary of the transportation position relating to the application.

## **Overview of Transportation Situation**

The proposed crematorium development is located on a narrow (single track for sections) unclassified road, locally numbered the U315 and C4 by Angus Council. This road does not have street lighting or footways and is subject to the national speed limit. The applicant has only assessed roads to the south-east and has not assessed the roads leaving west from the development despite the narrow single lane bridge at Burnside of Duntrune.

The applicant has proposed additional passing places with drawings indicating road widths generally of 5m, but varying from 4.2m to 5.7m in width. In general widths of 5.5m are suitable for cars, but can pose difficulties for bigger vehicles such as buses and refuse trucks or indeed passing agricultural vehicles which would be disproportionately affected by a rise in traffic flow on these roads. Inadequate road width is likely to lead to safety concerns, verge overruns and subsequent maintenance problems on the road. There have been 3 injury accidents in the vicinity in the last 3 years, and whilst non-injury accidents are not formally recorded, the local community have highlighted several incidents in recent times.

Whilst the appellants state that *“this is not a large scale development which will generate significant traffic movements”* this is incongruous with the 127 car parking spaces provided at the proposed development. The applicant’s Transport Assessment (TA) also demonstrates a 27% increase in traffic at the site frontage based on an average of 24 vehicle trips in each direction (which is significantly lower than the parking provision). Given the high level of parking provision combined with the poor alternative means of access and subsequent percentage increases in traffic on the road network, this is clearly significantly traffic generating.



Sustainable transport is increasingly important to address climate change and both Angus Council and national planning policies highlight the importance of good accessibility. The private car along with car sharing and taxis are bottom of the 'hierarchy of modes' with walking, cycling and public transport at the top. The development location is however isolated and has no footway connections to nearby areas. Whilst the appellants indicate the site is rural, this should be seen in the context that it is only around 1 mile from the built up areas on the outskirts of the City of Dundee.

Public transport accessibility is very poor with only school buses currently passing the development. The applicant has proposed to extend some of the 22 and 139 buses, however they only operate 2 or 3 services a day mostly at commuting times to/from Dundee and only service Tealing and Kirriemuir and no other significant settlements within Angus. Whilst the appellant's statement indicates that the bus companies have confirmed that they would be prepared to divert the services, the document D45 provided is only from Xplore Dundee and not Stagecoach Strathtay who operate the 22 and some 139 journeys. Equally, document D45 does not indicate a firm commitment to reroute the Xplore Dundee service and any such a commitment could require additional resource and funding due to additional mileage and time.

As such, both services are extremely infrequent, operating at irregular intervals and would not adequately cater for visitors to the crematorium. That the applicant has proposed private electric transport to local bus stops further highlights the unsuitable location and poor accessibility of the development. Requiring mourners to arrange for a private connection will also reduce the desirability of a public transport journey.

A critical aspect is the visibility splays from key junctions close to the proposed development. The applicant's TA notes that nearby junctions have substandard visibility. The development would be responsible for an increase and intensification of traffic through these substandard junctions which presents clear road safety concerns and is for the applicant to address.

The applicant's TA agreed with Angus Council that the desired visibility on the U315/B978 Kellas Road was 4.5m x 160m based on the current speed of traffic. This splay should be provided by the development for road safety purposes.

The appellants' statement of appeal indicates that the visibility splays requested by Roads Service at the U315/B978 are based on the 60mph speed limit of the B978 Kellas Road. This is incorrect - they are based on speed of traffic (85<sup>th</sup> percentile speeds) as measured by the appellants' consultant on Kellas Road. As traffic was surveyed to be travelling lower than the posted speed limit the visibility splays requested by Roads Service accord with a lower standard which matches traffic speed (50mph or 85A kph design speed).

It should be highlighted that these are the same visibility splays outlined in the applicant's TA (Paragraph 2.6). The TA further indicates that the visibility splays and the methodology of the length of these splays being based on 85<sup>th</sup> percentile traffic speeds was agreed between the appellant's consultant and Angus Council Roads Service at a scoping meeting in November 2019.

Suitable visibility splays should also be provided to meet the 85<sup>th</sup> percentile speed of traffic or the speed limit at the nearby junctions of the C4/B978 and U315/C4.

The C4/B978 junction, in particular has extremely poor visibility and based on the visibilities outlined by Angus Council Roads Service, drivers have visibility of oncoming vehicles at the 30mph speed limit for only 0.9 seconds (northwards) and 1.6 seconds

(southwards). This indicates how exceptionally poor the visibility is at this junction and the clear safety issue of increasing traffic through this junction.

The appellants' statement also outlines a potential speed limit reduction to reduce the visibility splay distances. Such a reduction in speed limit would not accord with the Department for Transport (DfT) and Transport Scotland Guidance on speed limits. DfT Circular 01/2013 states - "*Speed limits should not be used to attempt to solve the problem of isolated hazards, such as a single road junction or reduced forward visibility, for example, at a bend*". Transport Scotland's Speed Limit Review: The Assessment Process states - "*In addition to this, the guidance specifies that speed limits should not be used as an attempt to solve the problem of an isolated hazard*". Speed limits are set by the character of the overall road and are designed to be largely self-enforcing. Without changes in nature and character of the road, it is unlikely that drivers would slow from current speeds of 50mph to 30mph. The proposals to reduce the speed limit as an alternative to providing safe and suitable visibility splays are clearly against policy.

It is also likely that a Traffic Regulation Order (TRO) would be required to secure a reduced speed limit. A TRO would be subject to wider consultation including Police Scotland as well as the general public and parties may object to the order. Notwithstanding that the reduction in speed limit to suit the hazard would be against policy, the success of a TRO to enable the delivery of lower speed limits cannot be guaranteed due to the potential for objections.

It is noted the appellants offer a monetary contribution to the council regarding the proposed visibility splays, however no specific monetary offer is highlighted and it is vital that the appellants deliver visibility splays that suit the speed of traffic for road safety purposes.

### **Angus Council Comments**

We would agree with the Roads Service comments raised in their last response in December 2021 and proposed suspensive conditions of suitable visibility splays at both the U315/B978 and U315/C4 junctions. The provision of visibility splays that meet the required standard for the existing traffic speeds is essential for the safe operation of the road network given the increase in traffic proposed by the development. This should also be provided at the C4/B978 junction.

We also agree with Angus Council comments on the lack of appropriate sustainable transport options and the fact that staff and mourners would be forced to use cars to access the site due to lack of suitable alternatives.

We would also highlight that whilst the applicant indicates that Angus Council has changed their position, this is in large part due to inaccurate information on the achievable visibility submitted to the Roads Service by the applicant.

## Key Observations

- The location of the development would lead to it becoming a wholly car accessed development. There are no footway connections or convenient public transport access which is against policy.
- The proposed public transport options are infrequent, only service limited locations between western Angus and Dundee are thus unsuitable to serve a significant travel generating development such as a crematorium where people would wish a regular bus service.
- The local road network is narrow and unsuitable for the increase in traffic associated with the proposed development.
- The development intensifies the use of junctions, which the applicant's TA notes to have substandard visibility. Unless improved (with suspensive conditions) this represents a clear safety risk for all road users.

## Conclusions

The inaccessible location with no footway provision and extremely limited public transport would mean that staff and visitors would have virtually no option but to drive or use taxis to reach the crematorium. The site is clearly inappropriate for a significant travel generating use and is not readily accessible by sustainable means of transport.

All vehicles would be forced to use narrow and twisty roads to reach the crematorium. The development would significantly increase traffic through junctions with substandard visibility which represents a clear safety issue unless appropriate visibility is provided.

Yours faithfully,



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# **Funerals Market Investigation**

## **Summary of Final report**

**18 December 2020**

### **Introduction**

1. Funerals provide an opportunity for people to pay tribute to their loved one and they fulfil critical social, psychological and (for many) religious functions. Because of the crucial role funerals play in society, the distressing circumstances in which they occur, and the fact that funerals are one of the largest purchases many people will make in the course of their lives, it is important that those who purchase funeral services can be confident that prices are reasonable and the quality of service they receive is appropriate. It is this that our inquiry has sought to investigate.
2. The later stages of our inquiry have been conducted in the midst of the Coronavirus (COVID-19) pandemic which has had a significant impact on death rates with peaks much higher than average. The pandemic also materially changed the circumstances in which funerals can be conducted with immediate, and possibly long-term, implications for the behaviour, economics and structure of the sector. It has also had a major impact on the running of our investigation, the conclusions that we have reached and the timing of the actions that we shall be taking.
3. Nevertheless, we have serious concerns about the sector which we describe below. We are therefore going to put in place a number of 'sunlight' remedies which will support consumers when choosing a funeral director or crematorium and send a clear message to the sector that we consider its behaviour and activities should continue to be scrutinised.
4. These will include an obligation for all funeral directors to clearly and prominently set out the price for an Attended Funeral (a description of which we shall specify) so that those in the position of having to arrange a funeral can, if they wish, compare different funeral directors' prices before deciding which to use.

5. Our 'sunlight' remedies will also ensure that those arranging a funeral, whether or not they choose to purchase the Attended Funeral, know:
  - In advance the price that they will be paying and the terms of business, for example whether a deposit is required;
  - what services they will be getting for that price;
  - what other relevant business, financial and commercial interests the funeral director has (and we shall prohibit some practices such as payments to incentivise hospitals or hospices to refer customers to a particular funeral director); and
  - that funeral directors are formally registered, with the quality of key aspects of their activities subject to review by independent inspectors.<sup>1</sup>
6. We have also recommended that the sector should continue to be scrutinised by the CMA which will have access to information on funeral directors' and crematoria's revenues and volumes.

## **Competitive Assessment**

7. Our investigation has centred on how people approach the purchase of a funeral under the extremely difficult circumstances that precede and follow the death of a loved one, and on competition between funeral directors at this point of need<sup>2</sup> and between crematorium operators. We have also considered, among other things, how concentrated the supply of funeral director and crematoria services are, how prices have increased over time and the levels of profits suppliers are making.
8. At the root of our conclusions is the observation that most customers, unsurprisingly, find it extremely difficult to engage with the process of purchasing a funeral. This is not only because of the emotional vulnerability that will affect many in the period before and following the death of a loved one, but also because of numerous other factors that conspire against their ability to exercise choices in the way they would normally do when faced with such an important purchase: social pressures and seeking to do the right thing for the deceased (when often they do not know what the deceased would have wanted); pressure to make decisions quickly; conflicting demands on their time and energy, when they are short of both; lack of basic

<sup>1</sup> Subject to our recommendations to the UK government and devolved administrations in Northern Ireland and Wales being accepted.

<sup>2</sup> This includes the provision of services when a funeral plan is redeemed but not funeral plans themselves.

understanding or practical experience of what organising a funeral entails, having to do so very seldom in their lives.

9. As a result, when choosing a funeral director, people largely follow a personal recommendation (which often provides only scant information as to why it is made) or simply go back to the funeral director that they or their family have previously used, even though this may have been in the distant past and the ownership of the business may have changed in the meantime. None of this should be portrayed as a failure on the part of customers. The approach they take is a reflection of the circumstances that people face when someone close to them dies.<sup>3</sup>
10. The bereaved typically place their trust in the funeral director to guide them to the most suitable option for them. When it comes to choosing a funeral, customers (including the least well-off) are insensitive to price, although in recent years affordability has become a significant issue for some. They do value the quality of the service they receive throughout the funeral arrangement and delivery process, but they cannot easily judge this until after they have made the purchase and sometimes not even then. They care about how their loved one is being looked after but are not able to check how well this requirement is met in practice. Most people believe, incorrectly, that funeral directors are regulated.
11. Over 78% of the deceased are cremated. When it comes to choosing a crematorium, most customers do so on the basis of location (how close the crematorium is to where the deceased lived) or familiarity (whether they have been there before). Again, price is rarely a relevant factor in their choice, and, although quality matters to customers in general, very few customers compare alternative crematoria.
12. The way customers go about choosing a funeral director has significant implications for how funeral directors compete. In the absence of clear market pressures from customers, funeral directors largely rely on their own judgement to gauge what they think their customers need. This manifests itself most noticeably in the way they impart pricing information, which is often provided late in the sales process. Prices often cannot be obtained in a comparable format online or on the telephone and, once customers meet the funeral director to make the initial funeral arrangements, they are highly unlikely to switch to another provider.
13. Day-to-day competition between funeral directors is particularly muted: they monitor each other's activities but largely focus on their own services (and in

<sup>3</sup> Our conclusions on the way people choose a funeral are at paragraphs 3.189 to 3.196.

particular aspects of quality that can be observed by customers such as the condition of their premises and vehicles and staff training) and making sure that they are well known and visible in their local community, rather than responding to changes to the offerings of their competitors. We recognise that, in doing this, many funeral directors consider that they are acting in the best interests of their customers, often under challenging conditions. Our findings do not rely upon questioning the motives of individual funeral directors, but upon an assessment of how the market is functioning overall.

14. We have seen evidence that, recently, some funeral directors have sought to establish relationships with palliative care services, with a view to channelling dying patients, or their relatives, towards their services, thus by-passing competition for those customers altogether.
15. The two largest suppliers, the Co-operative Group Limited and Dignity plc, account for 30% of branches and are often significantly more expensive (which we estimate to be by approximately £800 and £1,400 respectively)<sup>4</sup> than many of the small, typically family-owned, businesses that operate the majority of branches in the UK. In recent years, Co-op and Dignity have been competing more actively in the supply of lower-cost funeral options (direct cremation and simple funerals), but this trend has not been significant among other funeral directors, and has not had a material impact on competition more broadly in relation to the types of (mainly higher cost) funerals that most people have continued to purchase.<sup>5</sup>
16. On the crematoria side, in addition to competitive constraints being very weak due to customers' tendency to choose a crematorium on the basis of location or familiarity, there are two significant barriers to entry by new crematoria, which have contributed to the high level of concentration of the sector: the planning regime, and the high sunk and fixed costs associated with the opening and operation of a crematorium. Historically, crematoria were opened by local authorities seeking to serve their local population, and 61% of crematoria are still operated by local authorities. Since the 1980s private companies have opened many new crematoria but, faced with high barriers to entry, they have tended to focus on areas where there was no, or limited, supply within a reasonable distance and to simply keep up with growing demand.

<sup>4</sup> Based on our analysis of pricing data gathered by SunLife from a sample of 100 funeral director branches. We calculated that the funeral director fees quoted by Dignity and Co-op were respectively £1,428 and £802 higher than those of the other funeral directors on average.

<sup>5</sup> To the extent that this has changed since the start of the pandemic, it is not clear whether this is a permanent or temporary change. Our conclusions on the way funeral directors compete are at paragraphs 5.178 to 5.193.

17. As a result, today, crematoria are generally few and far between. Many people have ready access to only one local crematorium, and few have access to more than three. To the extent that some crematoria may attract some customers on the basis of the quality of their offering, which normally means the underlying standard and maintenance of the buildings and grounds and the duration of the funeral service, there are not enough customers choosing a crematorium on this basis for it to drive an effective competitive process.<sup>6</sup> Therefore, whilst there are some differences in local competitive conditions between local areas (in terms of the number and identities of providers, and hence in the choices available in principle to customers), we have found that competition between crematorium operators is generally very muted.
18. We therefore conclude that the markets for funeral director services at the point of need and crematoria services<sup>7</sup> are not functioning well. We have found that a number of features restrict or distort competition:
- (a) Low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral.
  - (b) Lack of easily accessible and clearly comparable information on the products and services provided by funeral directors, including their prices and levels of quality.
  - (c) Lack of visibility to customers of the level of quality of care given to the deceased by funeral directors.
  - (d) High barriers to entry in the supply of crematoria services.
  - (e) High levels of local concentration in the supply of crematoria services.<sup>8</sup>
19. Because customers are so insensitive to price, it is not surprising that lack of effective competition has resulted in higher prices than we would expect to see in a well-functioning market. With average annual rates of increase of 5% over 13 years for funeral directors and 6% over 10 years for crematoria, price rises have been well in excess of general inflation for a considerable period of time. There are also significant price differentials between funeral directors within the same local area.
20. Between 2014 and 2018, the large national and regional funeral director firms have earned average returns that have been significantly and persistently

<sup>6</sup> Our conclusions on the way crematorium operators compete are at paragraphs 6.190 to 6.198.

<sup>7</sup> Our conclusions on market definitions are at paragraphs 4.105, 4.106, 4.108 and 4.109.

<sup>8</sup> Our conclusions on features are at paragraphs 8.9 to 8.25.



above the level one would expect in a well-functioning market. There is some evidence that returns have declined over the last two years for some, but not all, firms. For most firms, the level of return remains high. The persistent level of excess profits that we have seen amongst a wide variety of suppliers indicates that cost drivers or quality differentials cannot explain the pricing issues that we have identified.<sup>9</sup>

21. We estimate that the consumer detriment arising from lack of effective competition between funeral directors over the five-year period from 2014 to 2018 is at least £400 per funeral on average across a significant proportion of the market (ie customers of both large and many small firms). This is likely to be a conservative figure because it does not take into account potential inefficiencies (for which we have found some evidence), meaning that the total detriment figure is likely to be higher than our estimate implies, potentially significantly so. While the level of the profits earned by the largest suppliers declined over the last few years of the period, and we have some evidence to suggest that it may have fallen further for some of these firms in 2019, as of 2018 across the industry as a whole, it remained significant. Further, the decline appears to have been driven by a growth in costs, as well as reductions in prices. This suggests that the detriment suffered by customers – in the form of prices above the competitive level – may have declined to a lesser extent than our profit estimates would suggest.
22. With respect to crematoria, over the period 2014 to 2018, operators representing a substantial portion of the sector have made profits that are persistently above the level we would expect to see in a well-functioning market, some substantially so.
23. While the prices of private sector crematoria are often significantly higher than those of crematoria operated by local authorities, our profitability analysis indicates that customers of both private and local authority facilities have been paying too much, with the former overpaying by at least £115 per cremation and potentially as much as £210 on average, while the latter are overpaying by at least £80 per cremation and potentially as much as £170 per cremation on average.<sup>10</sup> We consider that the upper end of these ranges is more probable than the lower end.
24. Our detriment figures do not mean that all funeral customers ‘overpaid’ by precisely the amounts stated or that every funeral director and crematorium

<sup>9</sup> Our conclusions on customer outcomes are at paragraphs 7.171 to 7.180 (funeral directors markets) and 7.291 to 7.298 (crematoria markets).

<sup>10</sup> The estimates of customer detriment in the supply of funeral director services and crematoria are at paragraphs 8.26 to 8.44.

operator is responsible for causing detriment of this magnitude (or indeed at all). Rather, they are averages across those markets, and over time. Some customers will have overpaid by more than these figures, and some by less.

25. When it comes to the way the deceased are cared for by funeral directors between the time of death and the funeral, we have received concerning evidence from a range of industry participants and observers of problems that they have witnessed personally. Many funeral directors, and the two trade associations, acknowledged that, while in their view quality of care in the sector was generally good, there were instances of poor quality. We have therefore found that there are likely to be some funeral directors who are not providing acceptable levels of quality in this respect. Where this occurs, it is deeply detrimental to customers, who expect their loved ones to be treated with respect and dignity.

## **Remedies**

26. We have considered what remedies are necessary and appropriate to address our concerns about high prices and poor quality. Our preference is normally to seek to ensure that the competitive process can be improved to produce good outcomes for consumers in terms of price and quality. In the context of the funeral sector, while measures to improve the competitive process are valuable, they are unlikely to be sufficient because: consumers' circumstances following a bereavement mean they have significant difficulty in engaging with the purchasing process in general (and the issue of price in particular); there is strong evidence of high prices and important aspects of quality are not observable to purchasers. We have therefore been considering how far, in addition to remedies that improve competitive outcomes, there is a need for other measures including price regulation and a quality inspection regime.
27. COVID-19, and the essential public health response to it, have severely restricted our ability to fully develop all the remedies that we may otherwise have pursued in order to achieve a complete solution to the problems we have found. The exceptionally high death rates, and the particularly distressing and unusual circumstances in which funerals have had to be arranged since March 2020, have resulted in extreme pressures for funeral directors, crematoria operators and other stakeholders, such as local authorities. This has made it very challenging to engage with key parties, collect data and design potential interventions in detail.
28. COVID-19 and related government-imposed restrictions, including on the number of people who could attend a funeral service and other social distancing measures, have changed dramatically the economics of funeral

directors and crematoria alike, impacting both the cost of operation, number of funerals and types of funeral arranged during this period. Under such circumstances, and with ongoing uncertainty as to the future path of the pandemic, it has not been feasible to design and calibrate the price controls that we were considering in relation to both funeral directors and crematoria under more normal circumstances.

29. However, we consider that funeral customers may in the future require a level of protection beyond the measures that we are currently implementing. We are therefore recommending that the CMA should consider consulting on a future market investigation when the impact and consequences of COVID-19 on the funerals sector are sufficiently understood and the sector is more stable. If a future market investigation is undertaken, and competition concerns are identified as a result, any further protections funeral customers may need could then be considered. These could include, if appropriate, price regulation remedies.
30. In the meantime, we are taking forward a set of remedies that we describe as 'sunlight' remedies – shining a light on the pricing and back of house practices of the sector – to mitigate some of the concerns we have identified. The objectives are to support customers when making choices about funerals and to ensure that the pricing, business and commercial activities of funeral directors and crematoria, as well as the quality of the service that funeral directors provide, are exposed to greater public and regulatory scrutiny.
31. The measures that will be taken forward are summarised below:
  - (a) We shall require funeral directors to provide customers with price information in the form of:
    - (i) an itemised price list of frequently purchased products and services in a standardised format in line with a template provided by the CMA (the Standardised Price List);
    - (ii) the headline price (the Attended Funeral Price) of a combination of products and services, as specified by the CMA, which are provided by the funeral director and are generally considered to be sufficient to deliver an attended funeral (the Attended Funeral). The Standardised Price List will include the headline price and the disaggregated price of the Attended Funeral;
    - (iii) if the funeral director offers unattended funerals, the headline price (the Unattended Funeral Price) of a combination of products and services, as specified by the CMA, which are provided by the funeral

director and are generally considered to be sufficient to deliver an unattended funeral (the Unattended Funeral); and

- (iv) an itemised price list of all the products and services that the funeral director offers that are not included in the Standardised Price List (the Additional Options Price List).

We have provided an illustrative example of how this price disclosure requirement could be operationalised at Appendix X.

- (b) We shall require crematorium operators to provide customers and funeral directors in the local area, as well as to any funeral director upon request, with information on the price of: a standard fee attended service; an unattended service (if offered); and any available reduced fee services (if offered).
- (c) In addition, we will require funeral directors to disclose certain information about their business, financial and commercial arrangements to customers, including: the ultimate owner of the business; any business or material financial interest in a price comparison website operating in the funerals sector; and, any<sup>11</sup> gift, charitable donation or payment in kind to third parties such as hospitals, care homes and any other similar institutions.
- (d) We shall prohibit certain arrangements, including any exchange of services with, or payments, benefits or gifts to hospitals, hospices, care homes or similar institutions, as well as the solicitation of business through coroner and police contracts, in order to protect vulnerable customers from being channelled towards a funeral director that may not fully meet their needs.
- (e) We are making a recommendation to the UK government and the devolved administrations in Northern Ireland and Wales to establish in England, Northern Ireland and Wales an inspection and registration regime to monitor the quality of funeral director services, as a first step to the establishment of a broader regulatory regime for funeral services in these nations (Scotland already has a similar regime).
- (f) We are making a recommendation to the CMA Board to:
  - (i) actively monitor market outcomes in the funerals sector, in order to identify and, where possible, address any harmful behaviour;

<sup>11</sup> Except those that are de minimis.

- (ii) publish an annual review of market outcomes in the funerals sector;  
and
- (iii) consider at the earliest opportunity, when the impact and consequences of COVID-19 on the funerals sector are sufficiently understood and the sector is more stable, whether to consult on a future market investigation reference.

To assist the CMA in monitoring the funerals sector, we will require (by means of an Order) some funeral directors and all crematorium operators to provide the CMA with specific price and volume information on the goods and services that they provide to customers. In particular:

- (i) Funeral directors with five or more branches to provide to the CMA, every six months, details of a) the total number of funerals provided and b) the total revenue (excluding disbursements) in the previous six months.
- (ii) Funeral directors with ten or more branches must provide this information both in aggregate form and split by Attended Funeral, Unattended Funeral and any other types of funeral provided by the funeral director.
- (iii) All crematorium operators to provide details of a) the total number of cremations provided each quarter; and b) the total revenue during that quarter. This information must be provided in aggregate form and split by standard fee services (ie peak services from 10am to 4pm), reduced fee early morning attended services (ie services at 9am or 9.30am), unattended services and any other services provided by the crematorium operator.


32. Full details of our remedies package are set out in Section 9.



Ministry  
of Justice

# Response to the Competition and Markets Authority's Funeral Market Report

March 2021





Ministry  
of Justice

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## Introduction

The funeral sector has a vital role in the care of the deceased and are often the first to engage with the bereaved at a highly vulnerable and sensitive time. The work of the funeral sector covers a wide array of professionals, from funeral directors and crematoria staff to coffin makers. There are over 7,000 funeral companies in the United Kingdom, ranging from small family firms to large corporations. Users accessing services provided by the funeral sector should have confidence that their loved ones are cared for and treated with respect, as well as ensuring that they are fully aware of their choices and the costs of arranging a funeral.

On 18 December 2020, the Competition and Markets Authority (CMA) published the final report of its market investigation into the funeral market (covering funeral directors and crematoria specifically). This is a significant contribution to the understanding of how this distinctive market operates. This document sets out the government's response to the final report and the CMA's recommendations.

## Background

The functions of funeral directors are largely unregulated, except in Scotland. Quality standards in the provision of funeral director services are not prescribed by law, and there is no statutory inspection regime in relation to the services provided by funeral directors.

However, there is a broader regulatory framework which funeral directors are required to comply. There is health and safety legislation covering the safe handling and storage of bodies by funeral directors and their staff. In particular, there is a section in the guidance specifically for managing the risks of infection in funeral premises<sup>1</sup>. It outlines what a facility may need in order to be able to perform hygienic preparations and embalming, as well as adequate body storage and temperature controlled spaces. The guidance also highlights other relevant health and safety risks in this area including manual handling (moving bodies) and the use of chemicals.

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<sup>1</sup> "Managing Infection Risks When Handling the Deceased." Issue by the Health and Safety Executive, 2018.

In response to the COVID-19 pandemic, there is also specific guidance that applies to the funeral sector more broadly. This guidance addresses the handling of the deceased and the management of funerals in the COVID-19 context.<sup>2</sup>

Embalmers must also comply with the Control of Substances Hazardous to Health Regulations 2002, which requires employers to control substances that are hazardous to health, such as formaldehyde.

The CMA reported that 69% of respondents to their survey thought that funeral directors are regulated.<sup>3</sup> The funeral sector itself has also reported that users are surprised to find that the funeral sector is not regulated for quality purposes.

Although the original impetus for the CMA's investigation was driven by concern over the rise in funeral costs in recent years, the CMA has indicated that their investigation into funeral prices (which includes funeral director prices and crematoria prices) has been hampered by the ongoing COVID-19 pandemic. The market has been distorted by the types of funeral services offered to, and required by, customers as a result of coronavirus restrictions, and the ability of funeral directors to meet these changing requirements.

Because of this distortion, the CMA's findings (and proposed remedies, set out at Annex A) with regard to pricing are likely to need further consideration once the market has stabilised. Furthermore, because of practical pressures on the funeral sector caused by the pandemic, the CMA were unable to collect the data it needs until the pandemic subsides.

In this response, we summarise the key findings and recommendations of the CMA's final report, the government response to these recommendations, and our next steps.

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<sup>2</sup> "Guidance for those Involved in Managing Covid-19 Deaths." Issued by the Cabinet Office, April 2020.

<sup>3</sup> CMA report, p.323, section 7.72.

## **The CMA market investigation**

On 1 June 2018, the CMA launched a review of the funeral industry amid concerns that prices had been rising substantially and that funerals had become unaffordable for many. In its interim report published on 29 November 2018, the CMA proposed a Market Investigation Reference to carry out an in-depth investigation.

After consulting with stakeholders and reviewing evidence, the CMA decided there were reasonable grounds to suspect that there were features which prevented, restricted or otherwise distorted competition within the UK funeral sector. There was a further concern that people using funeral services are not able to make the best choices and are vulnerable to exploitation.

The CMA therefore decided to refer the supply of services by funeral directors, at the point of need, and the supply of crematoria services for a single in-depth investigation under section 131 of the Enterprise Act 2002 and focused on the following high-level issues:

- how users choose funeral directors and crematoria services i.e. pricing concerns
- how the deceased are cared for, i.e. quality concerns

The investigation was launched on 28 March 2019.

In its final report, the CMA found that in the provision of funeral director services at the point of need and crematoria services, a number of features restricted or distorted competition, namely:

- low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral
- lack of easily accessible and clearly comparable information on the products and services provided by funeral directors, including their prices and levels of quality
- lack of visibility to customers of the level of quality of care given to the deceased by funeral directors

- high barriers to entry in the supply of crematoria services
- high levels of local concentration in the supply of crematoria services

The CMA found that, whilst in most instances the quality of care provided to the deceased was generally good, there were instances of poor quality.

## **Recommendations**

The CMA decided that in the circumstances of the ongoing pandemic they would recommend a number of 'sunlight remedies'. These would shine a light on the pricing and back of house practices of the sector, designed to support users when choosing a funeral director or crematorium and send a clear message to the sector that they consider its behaviour and activities should continue to be scrutinised.

The CMA will be implementing a number of remedies around the transparency of pricing (detailed in Annex A). They also recommended that the sector should continue to be scrutinised by the CMA, which will have access to information on funeral directors' and crematoria's revenues and volumes. Following consultation, the CMA are expected to bring forward an order to implement these recommendations in June 2021.

### **Recommendation 1**

That the CMA Board actively monitor market outcomes in the funerals sector. To do this they should:

- publish an annual review of market outcomes in the funeral sector
- consider at the earliest opportunity, when the impact and consequences of COVID-19 on the funerals sector are sufficiently understood and the sector is more stable, whether to consult on a future market investigation reference

The CMA also made one recommendation to government.

## **Recommendation 2**

The UK government, and the devolved administrations in Northern Ireland and Wales, should establish in England, Northern Ireland and Wales an inspection and registration regime to monitor the quality of funeral director services, as a first step to the establishment of a broader regulatory regime for funeral services in these nations (Scotland already has a similar regime).

## **Government response**

### **The Funeral Sector**

The funeral sector, in one form or another, has provided a valuable service to the country for centuries. The funeral sector is often made up of unsung heroes within the community, with much of their work unseen by the public. The government recognises the hard work of the funeral sector, and further appreciates its dedication through the particular challenges of the COVID-19 pandemic. Funeral directors have met the demands of this particularly challenging period, often providing informal bereavement support in addition to their usual services. We also recognise that users usually interact with the sector at some of the hardest and most sensitive times in their lives, and consequently are particularly vulnerable to any bad practices where these may exist.

### **Government recognises the issues raised by the CMA's market investigation report.**

While the government understands the challenges that the sector is currently facing, we accept the CMA's findings on both the need for price transparency and improved quality standards in order to improve both competition and users' experiences and choice.

The CMA itself did not indicate whether a future regulatory regime should be UK-wide or that Wales and Northern Ireland should develop their own regime. In Scotland, the Scottish Government's burials and cremations policy and the enactment of related legislation provides its own regime to regulate funeral directors. We shall continue to work with those administrations going forward.

**Recommendation 1 - The CMA Board should actively monitor market outcomes in the funerals sector.**

The government welcomes the CMA's actions under this broad recommendation, recognising that they have reserved the right to conduct further investigations if these measures are found not to be fully effective. We support the objectives behind these proposals, to aid customers when making choices about funerals and to ensure that the pricing, business and commercial activities of funeral directors and crematoria, as well as the quality of the service that funeral directors provide, are exposed to greater public and regulatory scrutiny.

**Recommendation 2 – The UK government, and the devolved administrations in Northern Ireland and Wales, should establish an inspection and registration regime to monitor the quality of funeral director services, as a first step to the establishment of a broader regulatory regime for funeral services in these nations (Scotland already has a similar regime).**

The CMA recommends that the government establish a statutory registration and inspection body to monitor the quality of the transportation and care of the deceased (summarised as 'back of house' services) provided by funeral directors. The CMA examined the current self-regulation of the industry by the established trade bodies, the National Association of Funeral Directors (NAFD) and the National Society of Allied and Independent Funeral Directors (SAIF) and expressed concerns around conflicts of interest and the lack of reach to non-affiliated funeral directors (approximately 80% of funeral directors are members of a trade body).

The government agrees in principle to a form of registration and inspection and believes that such a move in the long-term would assist in achieving the overall objective of an improved customer experience.

The circumstances of the COVID-19 pandemic has brought the government and the funeral sector into a closer working relationship than ever before. From this experience, all parties recognise where improvements can, and should, be made. However, there is a recognition that wholesale regulation would take considerable time to implement, and may not be effective or proportionate in achieving the objective of improving customer experiences. In addition, funeral director businesses are diverse in size and operations and this will need to be taken into account in developing a regulatory framework, as will any particular effects of cultural and faith practices in preparing funerals.

In any event, given the ongoing circumstances of the COVID-19 pandemic, the government does not think that now is the time to move to wholesale regulation. However, the government and funeral directors are keen to make changes to address the CMA's recommendations in the short-term. We are confident from our engagement with the sector that they are very willing to co-operate in establishing both a consistent set of quality standards across the sector, and a mechanism for upholding and enforcing these. In the longer-term, more work is required to understand the likely benefits, risks and possible unintended consequences of a statutory scheme of registration and inspection. The government will continue to consider this, taking into account ongoing work with the sector and other stakeholders.

### **Next Steps**

Both users and the deceased have a right to dignity and respect. While the majority of funeral directors work hard to ensure that they receive both, we are keen to ensure that quality standards are as high as they possibly can be. The government will:

- work collaboratively with the sector (including sector groups and trade bodies) and user groups to develop an agreed set of quality standards (such as a voluntary code of practice), as part of a co-regulatory model, that could be introduced in

summer 2021, in parallel with the CMA's work on price transparency, to achieve a quicker outcome for users of funeral director services

- support the sector in developing a system to encourage all funeral directors to follow these quality standards and enable users to raise points of concern through a more formalised mechanism than at present
- commit to evaluating and reviewing the effectiveness of this co-regulation model
- monitor the effectiveness and success of the Scottish regulatory system that has just launched (and which applies to organisations who provide services in Scotland but may be based in Scotland and/or England), after a year

In the context of the ongoing pandemic, we believe that this is both a proportionate and appropriate approach. We are keen that action on quality standards is taken soon and believe that this is the best way of achieving this quickly in the current circumstances.

There also remains the possibility that once the CMA pricing transparency remedies are implemented and assessed, the CMA may decide to recommend formal price regulation. We will continue to work with the CMA to understand the impact of the planned remedies, their data gathering and the potential implications of any future recommendations on pricing regulation for the regulation of quality standards.

Although the CMA recommendations are about seeking improvements for users of funeral services, we are also keen to consider any lessons learned from the COVID-19 pandemic in terms of the funeral sector's response and data sharing with government. We want to use the strengthened relations and ongoing engagement with the sector as part of this work, as an opportunity for improved future planning and information exchange with government.



## **Annex A- The CMA's own remedies**

The CMA shall require funeral directors to provide customers with price information in the form of:

- an itemised price list of frequently purchased products and services in a standardised format in line with a template provided by the CMA (the Standardised Price List)
- the headline price (the Attended Funeral Price) of a combination of products and services, as specified by the CMA, which are provided by the funeral director and are generally considered to be sufficient to deliver an attended funeral (the Attended Funeral). The Standardised Price List will include the headline price and the disaggregated price of the Attended Funeral
- if the funeral director offers unattended funerals, the headline price (the Unattended Funeral Price) of a combination of products and services, as specified by the CMA, which are provided by the funeral director and are generally considered to be sufficient to deliver an unattended funeral (the Unattended Funeral); and an itemised price list of all the products and services that the funeral director offers that are not included in the Standardised Price List (the Additional Options Price List)

They will also require crematorium operators to provide customers and funeral directors in the local area, as well as to any funeral director upon request, with information on the price of:

- a standard fee attended service

- an unattended service (if offered)
- and any available reduced fee services (if offered)

In addition, the CMA will require funeral directors to disclose certain information about their business, financial and commercial arrangements to customers, including:

- the ultimate owner of the business
- any business or material financial interest in a price comparison website operating in the funerals sector
- any gift, charitable donation or payment in kind to third parties such as hospitals, care homes and any other similar institutions

The CMA will also prohibit certain arrangements, including any exchange of services with, or payments, benefits or gifts to hospitals, hospices, care homes or similar institutions, as well as the solicitation of business through coroner and police contracts. This will protect vulnerable customers from being channelled towards a funeral director that may not fully meet their needs.

To assist the CMA in monitoring the funerals sector, they will require (by means of an order) some funeral directors and all crematorium operators to provide the CMA with specific price and volume information on the goods and services that they provide to customers.

In particular:

- Funeral directors with five or more branches to provide to the CMA, every six months, details of a) the total number of funerals provided and b) the total revenue (excluding disbursements) in the previous six months.
- Funeral directors with ten or more branches must provide this information both in aggregate form and split by Attended Funeral, Unattended Funeral and any other types of funeral provided by the funeral director.
- All crematorium operators to provide details of a) the total number of cremations provided each quarter; and b) the total revenue during that quarter. This information must be provided in aggregate form and split by standard fee services (i.e. peak services from 10am to 4pm), reduced fee early morning attended services (i.e. services at 9am or 9.30am), unattended services and any other services provided by the crematorium operator.

Response to the Competition and Markets Authority's Funeral Market Report

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## University of Dundee

### Funeral Poverty in Dundee

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# Funeral Poverty in Dundee

## Funeral Link Evaluation



**Ruth Bickerton and Carlo Morelli**  
**University of Dundee**

**Final Report**  
**July 2019**



**University  
of Dundee**

<b>Project Reference Number</b>	<b>SIF-R3-S2-LUPS-017</b>
<b>Lead Applicant</b>	<b>Dundee City Council</b>
<b>Project Title</b>	<b>Tackling Funeral Poverty in Dundee through Social Enterprise</b>

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## Executive Summary

Funeral Link was established in 2018 within the City of Dundee with a role to address the problem of funeral poverty. Conservative estimates of household funeral debt within Dundee suggest a figure of over £0.5m per annum. Funeral Link seeks to address the problem of high funeral costs through the development of an advice service for the next of kin, immediately following a bereavement, outreach activities to encourage advanced planning for funerals, in areas of high deprivation, acting in an advocacy role between clients and funeral directors, to negotiate lower cost funeral options, and finally facilitating joint working across advice, debt, health and counselling services within the city whilst avoiding the dangers of competing for clients among existing agencies.

During the short duration of its existence Funeral Link has:

1. Provided one-to-one bereavement advice in the form of support for next of kin ranging from statutory and legal obligations to funeral arrangements.
2. Provided a valuable role in raising the profile of funeral planning and preparation in the City of Dundee through the development of outreach activities by targeting specific community organisations and organisations operating in areas of multiple deprivation.
3. Co-ordinated joint working across agencies and community groups within Dundee to facilitate referral and signposting of clients to receive expert advice and avoiding competition between agencies for clients.
4. Arranged with funeral directors to provide a high quality low cost funeral for clients referred from Funeral Link.
5. Raised the profile of funeral planning across the city via traditional press and radio media and social media through their website, Facebook and Twitter activity.

The research into funeral poverty in Dundee has identified that there are distinct segmented populations within Funeral Link's client groups each requiring distinct interventions. These are:

1. a) Deceased without a next of kin and next of kin with insufficient resources to provide for the legal requirements of disposal of a deceased. This population have only the recourse of an environmental burial provided by Dundee City Council and distinct measures to provide a respectful burial are required.
1. b) Deceased with a next of kin who believe they have insufficient funds for the legal requirements of disposal of a deceased. This population is a key client group for Funeral Link as they are able to assist through setting out lower-cost options that could be available to these families. This could involve compromise with a limited number of choices, but the family may find this preferable to an environmental funeral. Funeral Link's role also involves helping the family raise deposits, helping with Social Fund applications, liaising with funeral directors, signposting, referring and guiding clients to agencies, charities and external organisations capable of providing grants and low cost loans.
2. Next of kin on benefits that provide entitlement to a successful Social Fund Funeral Expenses Payment (SF200) application. This population is partly catered for by existing Funeral Directors who, in some cases, complete SF200 applications for clients. Funeral Link's role here is in resolving difficulties next of kin face in raising deposits and ensuring debt arising from additional funeral costs, not covered by the SF200 application, can be funded.

3. Next of kin on low household incomes without recourse to Social Fund applications. This should be the main target group for Funeral Link's activity. This population are least well served by the existing funeral directors in the market but stigma and social norms prevents next of kin making use of environmental burials. Funeral Link's role with this client group is much more extensive in identifying measures to reduce costs while retaining the need for a respectful funeral, signposting, referring and guiding clients to agencies, charities and external organisations capable of providing grants and low cost loans and negotiating with funeral directors for discounted prices for traditional services.
4. Next of kin with sufficient resources to be able to provide for their desired funeral. Funeral Link's services with this client group is one of limited advice and signposting for existing services.

### Recommendations

Funeral Link has provided a widely recognised valuable service within the City of Dundee during its initial phase of establishment. Across the city advice agencies welcome its establishment serving specific and specialist needs within the community that cannot easily be provided by existing agencies. Its future development should focus upon:

1. Working with Dundee City Council's Environmental Services organisations to establish a more respectful environmental burial provision for the client group unable to provide a private funeral. This includes specifically the provision of designated burial plots and attended services for next of kin. This segment of the population is distinct from other client groups and improvements to environmental burial services are unlikely to lead to any noticeable change in the numbers of families making use of environmental burial. Environmental burial will remain a marginal funeral activity for the City Council.
2. 'At need' actions, targeting and working with client groups 1b, 2 and 3 above. Specifically:
  - a. To give advice on reducing costs through adapting funeral requirements.
  - b. To work in a negotiation and advocacy role with funeral directors to obtain lower cost funerals for those who most need help.
  - c. To signpost clients and refer to partner agencies to help with grant funding
  - d. To signpost clients and refer to partner agencies to help with wider support
3. To help client group 3 with Social Fund Funeral Expenses Payments applications.
4. To help client groups 2, 3 and 4 with funeral planning education through
  - a. Advice on reducing costs in advance by discussions and communications between families through marketing and community events
  - b. Advice on administration prior to the 'at need' point through will-writing, Power of Attorney and funeral planning.

Funeral Link can also play an important role liaising with the local funeral sector, the local government and the national government. For example, there have been impacts at a local level, through clearer online pricing and availability of low-cost options by local operators. At a local level Funeral Link can work to help aid understanding of burial prices. At a national level, Funeral Link will support the implementation of the Scottish Government's Guidance on Funeral Costs within Dundee, through partnership working to improve transparency around pricing and quality. Encourage greater public understanding through promotions and marketing, and signposting clients and the public to new initiatives such as a Government supported incentivised savings scheme.

Funeral Link clearly has a vital role in assisting people organising a funeral within Dundee. Where market failure exists in the market, Funeral Link help clients, for example, by providing information about costs and options, to ensure customers have the ability to exercise choice. It plays an important advocacy role, and also an essential support role to the bereaved, who in many cases feel they have nowhere else to turn. The financial impacts of Funeral Link's work are beginning to be felt, to the benefit of many of the most deprived individuals, and the positive impacts on clients' health and well-being are set out in some of the case studies. The richness of Funeral Link's work can be felt through comments made in the case studies, where clients would have felt 'lost' without Funeral Links support. It is clear that there is no organisation playing a similar role to Funeral Link in Dundee, and that its impacts are being felt by individuals in some of Dundee's most deprived locations. Further work to be carried out by Funeral Link will include more of an educational role, targeting individuals to make plans at an earlier stage, such as will writing, and consideration of Power of Attorney, as well as consideration of savings schemes for their own funeral. Funeral Link's education work will feed into individuals and society being more prepared in advance for a funeral, meaning there will be less 'at need' help required, and ultimately lower levels of funeral debt within the City. Nevertheless, Funeral Link will continue with its core activities around promoting greater pricing and transparency, as well as increased choice in the market for a range of funeral options.

## CHAPTER 1: Introduction

A group of community and strategic partners came together in 2016 to form the Dundee Funeral Poverty Action Group in order to spotlight the issue of funeral poverty in Dundee, and to investigate potential solutions. The study and conclusions of this work suggested a raft of measures would help to address the issue of funeral poverty, although it suggested no one single solution would be a panacea<sup>1</sup>. These are listed below:

- *'A specific funeral advice and brokerage service to provide dedicated support at the time of bereavement where people are most vulnerable.*
- *Increased awareness of funeral and bereavement benefits and support to assess eligibility and submit applications.*
- *Affordable finance to become the norm hence the need to encourage dialogue is vital. The failure of many pre-paid funeral plans to cover costs is another matter worth highlighting.*
- *Local authorities to ensure burial and cremation costs are pitched at affordable levels and consider implementing a trusted trader scheme similar to the East Ayrshire model.*
- *Continued local and national campaigning to maintain the spotlight on the issue of funeral poverty and promote change and increased transparency in the industry.'*

The Dundee Funeral Poverty Action Group partners applied for funding which focussed on the first listed idea for a social enterprise model, through the Scottish Government/ European Union Social Innovation Fund Stage 1. The development of a feasibility study and business plan facilitated a subsequent successful application to the Scottish Government/ European Union Social Innovation Fund Stage 2. Funeral Link was thus established in 2019 within the City of Dundee aiming to directly target the problem of funeral poverty.

This report sets out work carried out by Dundee University, first to set out and understand the funeral process. This identifies the distinct problems of funeral poverty arising in terms of market failure and inability of next of kin to exercise choice. The report provides key data and findings in terms of funeral costs and prices, across the UK, Scotland and specifically within Dundee. Socio-economic indicators are set out to show the prevalence of funeral poverty in Dundee, and estimates are made of annual levels of funeral debt. Current policy is investigated to show how funeral poverty is being targeted at a UK, Scottish and local level, through different initiatives and support mechanisms.

All of these findings help to build a picture of the context within which Funeral Link currently operates. The penultimate chapter of the report presents findings around Funeral Link's success in fulfilling its aims, in particular meeting the 'measures of success' which are set out in the grant funding. In addition to these measures, impacts of Funeral Link can be measured through its influencing role, in promotions and prominence within Dundee, and investigations of relationships the Funeral Link team have made with partners and stakeholders.

The ability to evaluate the impact from a quantitative perspective was limited by the delay in the establishment of the service and the rising awareness that the target audience for funeral support

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<sup>1</sup> *Planning, Scoping and Social Impact Study*, Dundee City Council, December 2017

envisaged in the original measures of success was a sub-set of the original target client groups the quantitative indicators originally identified as the population within the SMID 40 areas.

Finally, conclusions and recommendations are set out in the final chapter.

The work has been carried out through extensive literature reviews, data interrogation, discussions with a wide range of over thirty stakeholders (see Appendix 1), and monitoring sessions, information-sharing and dialogue with Funeral Link. The discussions have included representatives from both the public and private sector, including both local and national Government, funeral directing organisations, third sector organisations, academic institutions, a funeral plan company, a credit union and charities. The local funeral directors were all contacted for their input, and we are grateful to those who agreed to meet with us. We are also grateful for a guided tour of Dundee Crematorium and a local funeral home (including mortuary), and follow-on discussions with representatives of national Dignity Plc, the largest private sector provider in the UK. The Centre for Anatomy and Human Identification also provided helpful background information and understanding, as did Dundee City Council's Environment Team for burials – both private and semi-private. The NHS Bereavement Team and Roxburghe staff met us and spent time explaining processes and support both at Ninewells Hospital and the Hospice. We are grateful for the time and input of all stakeholders.

## CHAPTER 2: The Funeral Process

### 2.1 Introduction

In order to understand the potential impact of Funeral Link, it is important to have a strong grasp on the funeral process and the nature of the funeral sector to understand where Funeral Link's assistance is most helpful. The chapter runs through the progression from death to organising the funeral, considering the process and problems encountered through the lens of economic theory.

### 2.2 Death

A death in a hospital environment follows a standard process. Next of kin are supported immediately and advice provided on what to do from nursing staff and an in-house bereavement team. Outside of the hospital environment a more varied approach is evident. Some good practice of bereavement advice is evident in organisations, such as hospice environments where death is a regular occurrence, whilst little advice is available where a death is unexpected or in a home environment. NHS bereavement leaflets, created by the Scottish Government, are widely distributed but additional advice is largely absent and bereavement packs provide little detailed local information.

Once a death is medically determined, assuming the death is not subject to Procurator Fiscal investigation, a Medical Certificate providing a cause of death is issued. This provides a next of kin with the ability to complete the statutory requirement of registering the death with the Registrar of Births, Deaths and Marriages. Registering a death requires an appointment, leading to a delay of several days. Contacting a funeral director would be expected to take place once a medical certificate is issued but it is often the case that delays in registering a death leads to next of kin visiting a funeral director in advance of a death being registered.

Once instructed by a next of kin, a funeral director will collect a deceased and remove them to their premises. This immediately creates inequalities between next of kin and a funeral director whereby consumers are now involved in a relationship without full knowledge of the funeral process and costs involved, while conversely the funeral director has little firm idea about the consumer's ability to cover costs.

### 2.3 The Consumer and choosing a Funeral Director

Kotler and Armstrong (2001: 193-97) set out the most widely understood model of the consumer's decision process, with five stages:

- i. **Need recognition** – identify what is needed
- ii. **Information search** - finding out what will satisfy the need
- iii. **Evaluation of alternatives** – deciding between the different options
- iv. **Choice/purchase decision** – purchase takes place
- v. **Outcomes/post purchase behaviour** – satisfaction levels of the consumer and decisions about whether to use the same company in the future.

This framework is useful in examining the decision-making processes of the consumer, first with respect to choosing a Funeral Director, and then second with respect to negotiating and agreeing the actual funeral details once the Funeral Director has been selected.



### *2.3.i Need Recognition*

There is an absolute need for a funeral – the decision to be made is not about whether to have a funeral, but about how to do it. Most people prefer to use a Funeral Director, mainly because of needing their expertise in understanding the funeral process, although there is not a legal requirement to do so. There are obvious areas of expertise in terms of how to look after a deceased, legal requirements and social norms, which a Funeral Director will organise on behalf of the next of kin.

There are two sets of consumer, the next of kin, at this point organising an ‘at need funeral’: those who know the wishes of the deceased and those who do not. Where decisions have already been made by the deceased, it is more straightforward for the person who is organising the funeral. However, where wishes are not known, there is more scope for uncertainty facing consumers in the funeral market. In particular, the next of kin may feel compelled into accepting sales advice determining what is required ‘for a good send-off’ by a funeral director or pressured into carrying out what they feel are ‘social norms’.

One level of uncertainty comes in the form of information asymmetry between the next of kin and the funeral director. This takes a number of forms: first the consumer is making decisions at a time of significant stress and cognitive dissonance. Grief and emotional distress limit the ability to process and evaluate information. Next of kin are thus uncertain as to the exact nature of the funeral director’s role and the funeral director’s role itself can be multi-faceted and ambiguous in three distinct areas.

First, in ensuring statutory requirements are followed by the next of kin, involving complying with the legal requirement that is to dispose of a deceased’s remains. Second, they also have a sales role. A funeral director is a direct service provider, involving the provision of services on behalf of the next of kin in the maintenance, care and movement of the deceased. In this sales role they additionally act as an intermediary sales organisation supplying services of third party providers such as booking slots at crematoria or burial grounds, ordering flowers, organising post-funeral receptions or placing notices in newspapers. A funeral directors third and final act is to provide counselling, advisory and even advocacy activities. Funeral directors provide counselling and comfort, listening to the next of kin and guiding them in decision making, through a one-to-one meeting to make the arrangements. Funeral directors also provide advisory information and signposting to next of kin for their bereavement journey and, finally, they provide advocacy functions with regulatory bodies such as the NHS, police or the Department for Work and Pensions, via the completion of formal applications for means-tested Social Fund Funeral Expenses Payments SF200.

The ambiguity within the funeral director/next of kin relationship facilitates both the development of information asymmetry in the contracting between parties but also the prospect of moral hazard in the potential abuse of the power relationship arising from these information asymmetries. Moral hazard can be understood as consumers making decisions detrimental to their wellbeing due to an inability to distinguish between the elements of the funeral director’s counselling, advisory and advocacy functions. There is the potential for what economists regard as opportunism in the contracting and price setting environment, as consumers’ preferences are revealed in advance to funeral directors revealing their price elasticities, allowing for the potential emergence of price discrimination and individualised pricing.

Evidence from the CMA suggests in practice there is a mixed approach to setting out costs clearly to consumers at the time a funeral is organised (CMA, 2018b: 44-54). As individualised prices are not always readily available in advance, it is difficult for the consumers to have an idea of expected prices, and the clarity of explanation relies upon the integrity of individual funeral directors, rather than legal or regulated

standards within the industry. Professional organisations, such as the National Association for Funeral Directors (NAFD) and the National Society of Allied and Independent Funeral Directors (SAIF) both set out requirements of clarity and standards in their Codes of Practice<sup>2</sup> but not all funeral directors belong to such associations, nor is there a legal requirement to do so.

### *2.3.ii Information Search*

Consumers' choice of funeral director and funeral can be understood within a context of the purchase of a 'distress purchase'. Distress purchases arise from the limited ability to determine the exact timing of the need for the use of a service. In the case of a bereavement, even if the expectation of the requirement may be known, the exact planning of the funeral and its timing is often unknown. The primary feature of a distress purchase is the lack of consumer's ability to search and evaluate the service being purchased. Consumers within these markets are then subject to significant information asymmetries in relation to negotiating contracts for services. Due to the relatively infrequent nature of a funeral purchase, consumers will often rely upon brand loyalty and word of mouth in their selection of funeral director, by using a funeral director they or a family member has used in the past or recommendations from friends or family.

The importance of brand loyalty for funeral directors is demonstrated by larger, national or regional companies choosing to keep the name of a local funeral director when they take over a business, rather than changing the name to the parent company. It is often very unclear that the ownership of a funeral directors has changed, even after purchase of a funeral. The funeral market can therefore be considered to be highly localised. Most funeral directors' clients are from within a small area of even a small city such as Dundee and it is therefore important to recognise that when discussing competition between funerals we are discussing competition between one, two or three providers in any given area.

Decisions need to be made about the storage and maintenance of the deceased before the funeral takes place, as well as the funeral itself. The norm is now to have the body stored at the funeral directors compared to a generation ago when it was common practice to take the deceased home until the day of the funeral. There are decisions to be made about whether the deceased should be embalmed. Other elements of the funeral requiring decisions include: the availability of viewing the deceased before the funeral; burial or cremation itself; religious elements; a service; the size of space needed for the memorial; details around a wake or celebration; type and quality of hearse; the need for and number of funeral cars; public notices in the paper and so on.

### *2.3.iii Alternative Evaluation*

The Competition and Markets Authority's (2019: 9) research highlighted that only 14% of people organising a funeral compare more than one. With such little information consumers are having to make judgments on two important factors in making their decision: price and quality.

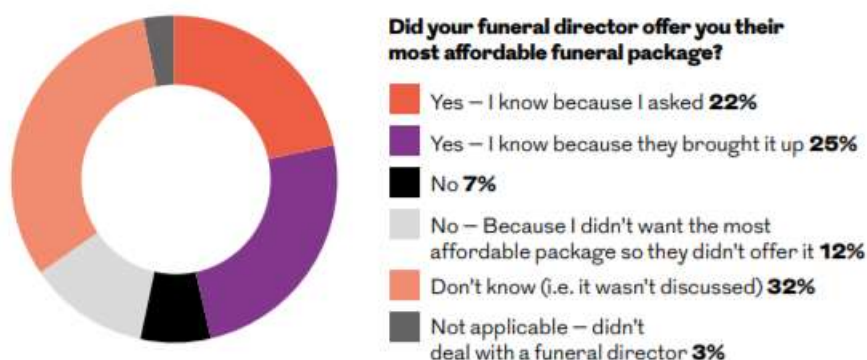
The CMA *Qualitative Research Report* (2018b: 25) shows interviewees had very little awareness that pricing could vary significantly between different funeral directors. Comparison websites, such as 'Beyond Life' and 'Your Funeral Choice', are recent additions to the market and display prices for seemingly comparable funeral 'packages'. However, it is not straightforward to price compare: it is often difficult to understand exactly what is included on each website, and prices vary between comparison sites as funeral

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<sup>2</sup> <https://nafd.org.uk/about-us/438-2/> and <https://saif.org.uk/wp-content/uploads/2018/03/Code-of-practice-updated-March-2018.pdf>

directors post their chosen price to publicise. CMA (2018b: 9) evidence shows only 4% of consumers search for a funeral director on the internet. Prices have historically been relatively lacking online. This was explained by funeral directors in Diundee as funerals being customised for each individual and a standardised ‘package’ demonstrating a lack of quality in the service provided. There is some evidence of funeral directors advertising prices in recent months where they are fixed e.g. the emergence of direct cremations or ‘prices from £X’. However, itemised prices as a longer list tend only to be available in paper copy from the funeral directors themselves, and sometimes only upon request.

According to the Royal London (2018) survey, a third of customers were not made aware of the lowest cost option by funeral directors, and a further 7% state they were not offered the most affordable packages at all.



Source: Royal London National Funeral Cost Index Surveys, Royal London 2018

In addition to pricing, consumers are generally unaware that funeral directors can differ in quality<sup>3</sup>. Much of what is identified as areas of ‘quality’ provision by funeral directors is not visible or experienced by next of kin. Variations can be the difference between refrigeration and the use of ‘cold rooms’, the use of embalming, the availability of bariatric provision for larger deceased or specialist provision for children, training of staff or the age and standard of the funeral hearse and limousine etc. Consumers often wrongly assume that funeral directors all have similar levels of quality and standards. Dignity (2018b: 35) found 92% of consumers expect some form of regulation exists. In reality, there are currently no fixed required standards or regulatory requirements for someone setting up a funeral director business. Whilst the Scottish Government has appointed the first Inspector of Funeral Directors, there is currently no licensing or formal quality assessment benchmarking in place. Therefore differences in quality between different funeral directors is difficult to assess for consumers, particularly in the quality and standards in terms of care of the deceased. This is carried out in private, in the ‘back office’ or behind the scenes areas which are generally not open to the public. However, the standards of setting up and maintaining high quality facilities in these areas incur higher costs on funeral directors in terms of buying quality equipment and having sufficient floor space for their needs. Funeral directors suggest higher costs are indicative of higher standards of care in these areas. There is little understanding by the general public about what is entailed in these areas – both because of a sensitivity around the nature of tasks, and also because of an assumption all funeral directors are bound by sets of common standards (Dignity, 2018b: 33). Price

<sup>3</sup> Industry research found that 90% of consumers assumed minimum professional standards and enforcement (Dignity, 2018b: 4)

differences are not demonstrably an accurate reflection of quality differences. Most established funeral directors indicate a desire to introduce minimum standards to regulate the industry, although there are differences in the extent to which agreement exists as to where these minimums should be placed.

Funeral directors signal their standards and quality to an extent through membership of Associations (such as the NAFD and SAIF), as well as through the quality of their premises externally and in reception areas. However, in the overwhelming majority of cases once a deceased is being looked after by a funeral director or a customer is physically in the funeral director’s premises, their decision to use that funeral director has been taken and any further signalling given by the quality of the premises may be irrelevant.

Even with the use of comparison sites it is difficult to conceptualise the interaction of quality with price and to garner an idea of ‘value for money’. The comparison sites do display ‘star ratings’ and comments, as given by customers. However, web-based ratings are subject to problems of verification and in the case of funerals people tend to have experience of only a low number of funerals and funeral directors. It is therefore difficult to compare concepts such as quality or satisfaction between providers.

The CMA (2018b: 30-40) sets out some consumers’ experiences with choosing a funeral director. As identified earlier, most do not compare two or more, and for the small number who did shop around, this was to increase a sense of control over the costs and service quality. The difficulty in comparing prices online was further noted, with many websites showing ‘prices from £X’.



Source: Competition and Markets Authority: Funeral Markets Study. Qualitative Research Report. 2018, p.31

### 2.3.iv Choice/Purchase Decision

Once a funeral director itself has been selected consumers embark on a second round of decision making, to discuss and agree the details of the funeral itself. Again the CMA (2018b: 18-22) indicates that these choices are highly constrained for those consumers who had arranged ‘at need’ funerals. The following aspects of a funeral were deemed by the majority of respondents to be ‘non-negotiable’: a funeral director for storing the deceased and making arrangements for transportation and disposal; a service, mourners and a gathering afterwards; and a certain standard of coffin. Other elements were perceived as negotiable – particularly if they had the tacit permission of the deceased, including: the use of funeral cars; coffin

quality; visiting the body; embalming; flowers; and the issuing of a death notice. How prepared a consumer was to go against or relax social norms varied in the survey around: socio-economic group (C2, D and E respondents were more likely to adhere to the traditional funeral norms); age (more traditional norms were perceived to be important for the older generation, whilst younger respondents were more likely to consider personalised funerals); and religion and ethnicity (different religious or cultural norms were important to those identifying strongly to their religion or ethnic group).

The contracting for services such as funeral services may be considered to be a particular case of Akerlov's (1970) 'Market for Lemons'. Akerlov, in his Nobel Prize-winning Economics paper 'The Market for Lemons', postulated that information asymmetries between buyers and sellers accounted for large differences in prices, in Akerlov's case between new and nearly new cars. Risk averse consumers assume a seller has knowledge of the quality of a nearly new car unavailable to the buyer. In such an environment buyers must assume the quality of the car to be low for it to be on sale and therefore they require a significant discount on the new price. Poor quality drives out good quality in these markets leaving only 'lemons'. Within the funeral market consumers assume high price reflects high quality and low price is driven out of the market as consumers are readily convinced they are purchasing quality – a 'fitting send-off' - but have insufficient information to be able to determine the reality. Thus, the ability to distinguish between price and quality is a particular feature of the funeral sector.

The one-to-one meeting to arrange a funeral facilitates funeral directors ascertaining not just the wishes of the deceased or next of kin but also the ability to pay. As identified above the three roles of the funeral director in statutory, sales and advisory activities are combined and indistinguishable within the meeting leaving next of kin with little opportunity to exercise informed consent. Parsons (2003) discusses the relationship between funeral director and the bereaved. *'From a rational perspective it is possible to see how the funeral director can be accused of profiteering from the misfortune of the bereaved; the funeral is discussed in the framework of a commercial transaction in the immediate aftermath of loss'* (Parsons, 2003: 69).

Research in Dundee suggests that funeral directors' discussion of the ability to pay covers areas of whether or not insurance or a funeral plan is in existence, whether a Social Fund application is required or whether or not the next of kin will be financing the funeral directly. These discussions lead to 'individualised' pricing of funerals with changes to the initial proposals leading to substitution of some goods and services for others and adjusting of prices as a result. Funeral directors maintain that they encourage next of kin to avoid excessive costs, partly due to concerns over levels of debt within the business, however, Royal London (2018) evidence indicates that costs of funerals does not vary markedly with household income levels.

The one-to-one meetings to arrange funerals provide funeral directors with the informal ability to segment the next of kin into distinct groups. We can broadly define these groups as follows:

1. Those for whom a Social Fund application is highly likely to be successful. Funeral Directors have significant experience in the completion of the SF200 form and often provide detailed support to next of kin, in some cases completing the form themselves. Here the funeral director can ascertain the level of funding that can be guaranteed and deposits are often required to cover the additional expenditure not covered by the Social Fund.

2. Those next of kin in low income households but unable to access Social Fund payments. Funeral directors seek to minimise their own levels of potential debt and it is this client group who they seek to identify most closely. Formal credit checking does not appear to be utilised but informal forms of creditworthiness are utilised for this client group. Thus local, longstanding funeral directors will have knowledge of past history with previous funerals for many local families, informal knowledge of the family background, past payment history and the employment status of the next of kin and wider family members is therefore often available.
3. Finally, there are those households with the means to purchase a full price funeral. These households, unlike those applicants for the Social Fund, are often not required to provide deposits and thus potential delays in organising a funeral, while a deposit is found, are not presented to these households. Again informal credit checking can replace formal credit checking. In a highly localised market postcodes, employment and family relationships all act as a proxy for the ability to pay.

Low income households are more likely than high income households to have to provide a large deposit as a result of this segmentation. Low income households are more likely to be reliant upon the funeral director's discretion on the adjustment of costs than high income households, where their ability to pay is not a significant factor in the choice of provision.

### *2.3.v Post Purchase*

Post purchase evaluation of a funeral for consumers is complicated by the peculiar characteristics of a funeral service. As demonstrated above, search activity is low, there can be switching costs for consumers once a deceased's body is in the possession of a funeral director (and ease of not-overcomplicating matters at a time of distress) and pricing structures can be opaque.

The provision of funeral services themselves can be considered to be what economists would describe as an 'inferior' goods with an inelastic demand curve. This is to suggest that as prices rise and fall, demand for the good does not decrease or increase as with normal goods. Consumers forgo other consumption in order to maintain consumption of a funeral when prices are high and if prices were to fall, no additional consumption would take place as the number of funerals is a fixed quantity. Indeed higher prices can make the good more, not less, desirable in a particular form of inferior good known as a 'Giffen' goods (Frank, 1994, pp.114-15). This property of the service derives from the encouragement of a belief that social norms and displays of grief and bereavement are expressed by the provision of a full service funeral. The consequence of such social pressures results in households forgoing consumption goods in other areas in order to fund the purchasing of high cost funeral services.

For low income households especially evaluation may be hindered by what Sheehy-Skeffington and Rea (2017: 6) identify as the inability to guarantee long term financial security for an explanation as to why low income households greater preference for immediate consumption over delayed consumption and hence acceptance, in this case, of higher cost funerals. They suggest 'people lower in socio-economic status put a lesser weight on personal aspirations and achievement, in favour of helping others and conforming to community traditions. Some studies also find that they have more compassion and generosity than those higher in socio-economic status.' As a result, funeral debt for low income households may be understood as a necessary requirement of social conformity.

Evaluation may also be still further hindered by the provision of informal credit by funeral directors for low income households and low income households needing to retain the patronage of the funeral

director for future funeral provision. As a result the extent to which objective post purchase evaluation can take place is not simply linked to information asymmetries at the point of purchase, but also the future expectations of vulnerable households and the on-going reliance of consumers on funeral directors for credit.

## 2.4 The Funeral Market

The funeral market has distinct and related properties which distinguish it from other markets for services and explain why it is difficult for the market to operate as other markets would be expected to operate. The fixed nature of demand and the oligopolistic nature of competition together increase the potential for market failure leading to consumers paying higher costs than might otherwise occur.

In most consumer markets a reduction in price would be expected to increase the consumption of the service. This is not the case for funerals. Demand for funeral services is what economists would understand as inelastic and changes in price therefore do not impact on the quantity demanded within a market. The consequence for the supply of funerals and competition is thus that, for entry of new producers into the market to occur (or alternatively for existing firms to cut prices) the only change would be for existing demand to be redistributed among the producers of funeral services. Market competition in this environment is what many would understand to be a zero sum game.

Attempts to influence the timing of purchases for funeral services occurs through pre-payment and funeral plans, in order to bring forward income to firms, but this cannot alter the absolute market size for funerals. Market size is influenced, and predictable, by the demographics and life expectancy of the population as a whole and therefore of a relatively fixed size with the consequence that entry into the market by new producers has historically been discouraged.

The funeral service market itself is thus characterised as a market in which imperfect forms of competition operates in the form monopolistic, duopolistic or oligopolistic competition. These market structures allow forms of market regulation such as price leadership, price setting and market sharing to exist

### *Crematoria*

Crematoria effectively hold an almost monopoly position. The CMA (2018a) reported that 64% of those in their consumer survey had no choice of crematorium, as there was only one locally (49%) or because the deceased had specified the crematorium (15%). The report concludes that crematoria do not compete over price to any significant degree, first because there is a perception of limited choice by consumers, and second the price differential between crematoria in a location may not be large enough within the overall price of the funeral to influence the decision. In the case of Dundee three quarters of funerals are cremations and just one quarter burials. The significant cost differential between cremation and burial, with burial being 80% more expensive than cremation in 2018 (see Chapter 3) means that burial is not a close substitution for cremation for most next of kin.

The CMA (2019: 89) found the average drive time to the closest crematoria was 34 minutes for the nine most expensive crematoria – almost double the time for the nine least expensive crematoria. In addition, two thirds of these more expensive crematoria had no other crematoria within a 30 minute drive time, compared to just one in nine of the least expensive. This crudely suggests prices can be kept artificially higher where competition is lower.

## Dignity high and low-price crematoria, 2017

	Nine most expensive Dignity crematoria	Nine least expensive Dignity crematoria
Average cremation fee	£999 <sup>4</sup>	£705 <sup>5</sup>
Average fee of closest crematorium	£772	£690
Average drive-time to the closest crematorium	34 minutes <sup>6</sup>	18 minutes
Number with no other crematoria within 30 minute drive time	6 out of 9	1 out of 9
Number with a Dignity crematorium within 30 minute drive time	1	0

Source: CMA *Funerals Market Study, 2019*, p. 89. CMA analysis of Cremation Society data and ArcGIS mapping software

Whilst Dignity stress the preference of consumers for longer time slots based on their research (Dignity, 2018a), the CMA (2019: 92) research suggests there is little evidence that consumers choose their crematorium based on slot length. The entry of direct cremation, in which the cremation takes place in a different location and at a different time from the funeral service, is a newly introduced challenge to the structure of the cremation market and may provide evidence on the influence of quality on crematoria provision. Companies such as Caledonia Cremation in Scotland, established in 2017, offering direct cremation with a cost leadership strategy as a not-for-profit organisation, whilst bringing a markedly different business model, have however yet to demonstrate that the quality and price relationship within the existing market structure can be restructured. Other providers, such as Dignity Plc's 'Simplicity' brand and indirect cremation options through national and local funeral directors, are more widely available and suggest changing practices within the funeral sector to provide a wider choice for consumers.

### Burials

Similarly, the market for burial plots is not competitive. In the main, cemeteries are owned and maintained by Local Authorities, although there may also be additional burial sites in private ownership, such as natural burial grounds, woodland burial sites and private cemeteries. Some – although not all – Local Authorities have a policy of charging higher prices for people opting to be buried within their cemeteries who lived outwith the Local Authority boundaries. For this reason, there can often be no or little choice in the price of burials for someone seeking a burial plot, and no scope for discussion or negotiating on price. Generally, the only alternative will be to be cremated, which generally holds a lower price tag, but may not be the preferred option for everyone for reasons of personal preference or religion. It can be possible to buy a burial plot in advance of a death, although the specific plot may not necessarily always be selected.

Whilst Local Authorities are generally assumed to charge as low a fee as possible for residents, Citizens' Advice Bureau (2019) shows there are great divergences in charges between Local Authorities, with some making much larger than inflationary-level increases in recent years. It is currently generally unclear how prices have been set, and whether prices simply cover costs, need to be subsidised, or indeed cross-subsidise other areas of Council spend.

<sup>4</sup> All nine crematoria charged a fee of £999 in 2017, compared to a national average of £737.

<sup>5</sup> The nine crematoria charged between £600 and £803 in 2017, compared to a national average of £737.

<sup>6</sup> Based on eight crematoria. The remaining high-price Dignity crematorium did not have an alternative within a 100-minute cortege speed drive time so was excluded.



In accordance with the Burial & Cremation (Scotland) Act 2016, local authorities are bound to issue information on burial costs. Within their Funeral Costs consultation (Scottish Government, 2019a: 41-49), the Scottish Government sought views on measures to improve transparency of and public engagement with the local authority charge setting process, and in their published Guidance on Funeral Costs (2019b: 9), Local Authorities are encouraged to improve explanations and clarity in this area. Chapter 3 sets out more detail on burial charges in Dundee and its environs.

### *Funeral Directors*

The activities of funeral directors can be understood to take place in a duopolistic and oligopolistic market structure. Dignity Plc and the Co-Operative Funeral Service are widely recognised to be the two dominant companies in the market, followed by Funeral Partners, with the rest of the market being made up of a larger number of smaller regional multiple chains and local independent firms (CMA, 2019: 25).

Within duopolistic and oligopolistic markets, where two or a small number of firms dominate market share, prices can nevertheless still be set. Bertrand, Cournot or Stackleberg forms of duopolies are all readily understood types of duopoly whereby through tacit or formal cooperation prices can be regulated (within a Bertrand model), or market shares can be regulated (in a Cournot/Stackleberg case). The key finding of these, and game theoretic models, is to identify the role tacit collusion plays in duopolistic markets (Frank, 1994, pp. 518-27). Within a price leadership arrangement, the larger dominant firms set the prices within the industry and smaller, independent firms set their prices in relation to the dominant firm. Note this does not require formal collusion, although this may exist, rather it requires a recognition that the dominant firms provide a signal for the price setting of the services provided. Enforcement of price leadership, if required, would be available by the price setting firm's ability to engage in price competition that would force exit from the market by smaller service providers. Price leadership in a duopolistic funeral market is also facilitated by the traditional local nature of the funeral market. Funeral services are provided by highly localised companies and it is rare for independent funeral directors to operate across local boundaries. Thus, funerals have traditionally been arranged between the next of kin and the funeral directors in person rather than using other remote technologies such as call centres widely available in other customer service industries, although there is evidence this is starting to occur.

Within Dundee a total of 7 companies operate through 15 outlets, in which national companies Co-op and Dignity run 2 each. The Edinburgh-based William Purves Funeral Directors Ltd run 2 operations within Dundee. Local, independent companies Sturrock, Comb and Davidson run 4 outlets, James Ashton & Son Ltd run 3 outlets, and the remaining 2 independent companies have single outlets. Across the UK a number of small regional groups of funeral directors firms are also emerging, with Fosters in Scotland being a notable example, but in Dundee this organisation is currently absent.

While above the explanation for the market failure in the funeral market was outlined in terms of the next of kin's perspective, the market failure also has an impact on the behaviour of the firms within the funeral industry.

Understanding what the consumer can afford is not simply a requirement for price discrimination, it is also an important function of the funeral directors operations in limiting the company's bad debt. Parsons (2003: 73) notes the problems with cash flow for funeral directors where they incur costs prior to payment from the consumer. Funeral directors fund the disbursement costs in advance of their client and with cremation costs accounting for 32% of the total funeral price, and burials around 45% (see Chapter 3), levels of cash flow and debt are key determinants of the success or failure of a funeral director's finances.

## Funeral Directors and Outlets in Dundee, 2019

	Ownership	Number of Outlets
Affertons	Independent	1
Co-op (Arbroath Road)	Co-op	1
Co-op (Macalpine Road)	Co-op	1
James Ashton & Sons/ Edward McHugh	Independent	3
James L. Wallace	William Purves Group	1
J&J Gray	Dignity	1
J Smeaton	Dignity	1
Millar Family Funeral Directors	Independent	1
Robert Samson	William Purves Group	1
Sturrock, Comb and Davidson	Independent	4
	<b>Total Outlets</b>	<b>15</b>

Source: Web-based search, local knowledge and Companies House

Where a funeral director suspects the client may be unable to pay, and the funeral director may acquire 'bad debt', deposits become common place, as discussed by Parsons (2003: 73). It is unknown at the time of arranging the funeral, whether the client might be able to claim the Social Fund Funeral Expenses Payment – although discussions with funeral directors suggest they have good knowledge of the likelihood of successful claims based on their past experience. For this reason, deposits can be requested by the funeral directors, to ensure some level of payment is guaranteed. The immediate requirement of a significant sum of money may be problematic for next of kin and can be the start of the decline into funeral debt, through borrowing, selling off assets, payday loans, or foregoing of the essentials e.g. food, heating or rent payments. Funeral directors have noted a change in behaviour within society over time, as it used to be more commonplace to have insurance plans to cover funerals, and payment was guaranteed. There is evidence some funeral directors are already helping families in need, such as through offering extended payment periods.

The funeral director's role has remained relatively static for many years. Whilst the funeral directors' origins can be found in the associated activities of carpenters and woodworking companies or garage owners, many of today's funeral directors are specialist organisations with greater or lesser degrees of investment in specific assets. While buildings can be changed in function, the backroom facilities in cold rooms and refrigeration, funeral limousines and hearses are not easily adapted for alternative uses. Thus the industry itself has been relatively static for many years with little innovation. From the established funeral directors' perspective, while the dominant duopolistic firms of Dignity and the Co-Op set high prices smaller firms can adjust their prices at a small discount to those set by these two firms. Smaller firms' concerns lie not with the actions of the larger dominant firms but with the potential for entry by smaller, and less well-equipped firms. Thus, the low-cost unregulated sector provides a threat to the continued success of established firms and therefore the dominant view presented by the smaller chains and independent firms was to favour regulation conditionally on the basis that the levels were neither set too high nor that the regulatory minima were applied selectively and low cost entrants could avoid regulation.

The Funeral Directors' role is multi-faceted, and requires a deep level of experience. Many report services being difficult to 'package', as clients' needs vary. For example, the number of meetings with clients can

vary, costs of treating the deceased can vary depending on cause of death, clients may wish to discuss or input on service sheets, the number of arrangements will vary (e.g. funeral directors may or may not help with arrangements for flowers, reception venue, catering etc), memorial arrangements may be required, and so on. There are concerns that standardised 'packaged' prices will not allow funeral directors to continue discretionary assistance provided at-need to the client, and thus ultimately standards could decline across the profession.

### *Local Authority Funerals*

If a deceased does not have a next of kin or the next of kin is unable to provide, ultimately the Local Authority will be required to take care of the funeral. These are generally known as 'Local Authority funerals', 'National Assisted funerals', 'semi-private funerals' or 'environmental funerals'. In these circumstances, the funerals act as a safety net for those who are unable to have a funeral through other means and the market is not relevant. What is provided and what aspects are included at such a funeral varies by Local Authority (see Appendix 2).

Research by Stirling District Citizens Advice Bureau (2018) compares the provision across all Local Authorities within Scotland. In Dundee, a 'Local Authority' funeral includes viewing of the body, a coffin, a hearse, an additional car, and a notice in the paper. The deceased is buried in a communal grave in Birkhill Cemetery (unless the deceased already has a lair in their name) and there is no option for cremation. The funerals do not include a minister or celebrant fee, flowers, a headstone, aftercare support for relatives, or support in applications for the Social Fund. It is clear that the provision of Local Authority Funerals varies greatly by location. For example, only Dundee and East Lothian provide extra cars. 84% of Local Authorities provide coffins. Only 4 Local Authorities provide a headstone for burials.

Environmental funerals remain a last resort for next of kin without the ability to afford the most basic of funerals. Stigma and the public display of a lack of resources de-legitimise environmental funerals for even the lowest income households. There should therefore be little concern that environmental funerals will increase irrespective of how stigma is addressed. Nevertheless, developing a respectful form of environmental funeral may well be of benefit to those with no ability to make alternative arrangements.

## 2.5 Summary Conclusion

Consumer rights legislation is currently poorly aligned to and unable to address many of the areas of contracting and evaluation for next of kin on their bereavement journey. In part this is due to the type of service provision provided and the problems of understanding the contracting next of kin have to navigate in the organising of a funeral. However it is also a result of the market structure developed within the funeral sector.

Loyalty and word of mouth reputation for funeral directors is perceived to be extremely important on the part of their success. They understand that the majority of their customers are either repeat customers through the generations of a family, word of mouth recommendations from a close friend or through the attendance at a funeral organised by that funeral directing company.

As this report now demonstrates the funeral sector and its structure facilitates the information asymmetries that create the areas whereby consumers have limited control over price and quality: the monopoly of service provision; the 'hidden' aspect of funeral costs; and the nature of the purchase. Essentially, most people do not see an alternative to using a funeral director and funeral directors have a

seemingly constant source of demand for their services. The role of Funeral Link in addressing these area, now and in the future, is addressed through the report.

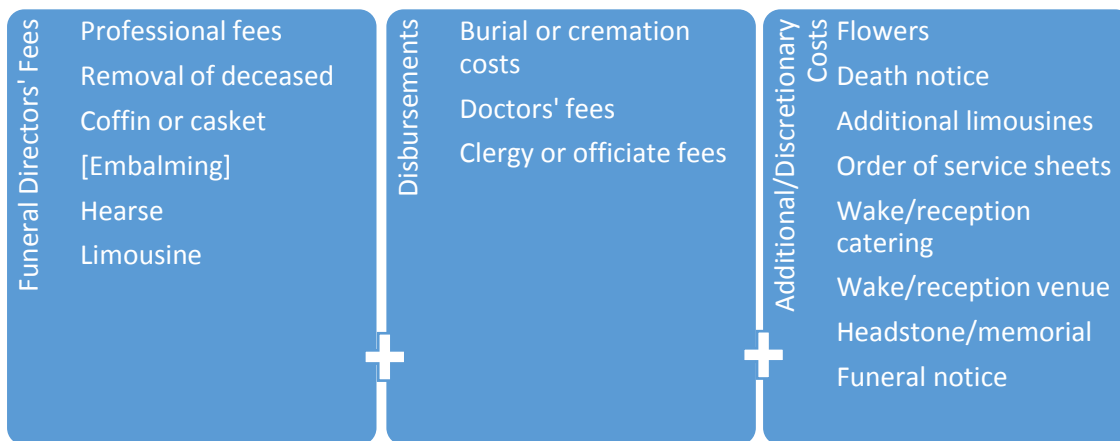
## CHAPTER 3: Funerals and Funeral Poverty Data

### 3.1 Funeral Costs

#### Average Costs – UK and Scotland, 2018

Ascertaining the average cost for all aspects of a funeral is not a straightforward task. There is no one agreed industry-wide standard for what should be included in a headline price, nor are disaggregated prices widely available to use for surveys, there are different ‘types’ of funeral (indirect cremation, basic funerals, full service funerals), names and descriptions also change, and, to further complicate matters, prices can vary by location. As discussed in Chapter 2, funeral directors do not tend to display disaggregated prices online, meaning local prices are difficult to ascertain and compare. Below we set out what information is available, the sheer amount of which highlights the complexity of understanding the costs for the consumer.

Sunlife and Royal London carry out extensive annual surveys to make estimates of what Sunlife describes as a ‘basic funeral’ and Royal London describe as a ‘low cost funeral package’. The basic funeral costs split into funeral directors’ fees and disbursements. Additional or discretionary costs can be added on to these, as set out below and these may be paid through the funeral director.



An average basic funeral is estimated to cost between £3,757 and £4,271 in the UK, and between £3,499 and £4,085 for Scotland<sup>7</sup>. When additional costs are included, the cost rises to between £5,820 and £6,146 in Scotland.

#### UK Average Funeral Costs Estimates, 2018

	Sunlife	Royal London
<b>Funeral Director Fees</b>	<b>2,595</b>	<b>2,153</b>
<b>Cremation</b>	<b>832</b>	<b>792</b>
<b>Burial</b>	<b>2,174</b>	<b>1,960</b>
<b>Celebrant/Minister</b>	<b>159</b>	<b>154</b>
<b>Medical Fees</b>	<b>164</b>	<b>164</b>
<b>Additional/Discretionary Costs</b>	<b>2,061</b>	<b>2,321</b>
<i>Flowers</i>	<i>171</i>	<i>152</i>

<sup>7</sup> Some of the reduction is accounted for by the removal of medical fees in Scotland.

Death Notice	73	72
Order of Service Sheets	82	60
Wake/Reception Catering	362	422
Wake/Reception Venue	210	360
Headstone/Memorial	824	871
Funeral Notice	76	78
Limousine	264	305

Source: Sunlife *Cost of Dying 2018*, Royal London *Buried in Debt 2018*

### Burial Funeral Average Costs, 2018, UK, Scotland and Dundee

A basic burial funeral was estimated to cost £4,626 in Scotland (source: Sunlife, 2018). Burials are generally more expensive than cremations because of the cost of buying a plot, plus additional costs such as perpetuities, title deeds etc. It may be less expensive if a family already owns a plot. Based on a different set of aspects for a 'basic funeral', Royal London (2018) estimates **a burial funeral in Dundee costs £4,194 – the eighth highest in Scotland<sup>8</sup>**.

### Average basic funeral costs, UK and Scotland, 2018

	Sunlife		Royal London	
	UK	Scotland	UK	Scotland
Basic Funeral	4,271	4,085	3,757	3,499
Basic Funeral + Additional Costs	6,332	6,146	6,078	5,820

Source: Sunlife *Cost of Dying 2018*, Royal London *Buried in Debt 2018* (spreadsheet Funeral Costs Breakdown in Data)

### Cremation Funeral Average Costs, 2018, UK, Scotland and Dundee

A basic cremation funeral is estimated to cost £3,544 in Scotland (source: Sunlife, 2018). Again, based on a different set of aspects for a 'basic funeral', Royal London (2018) estimates **a cremation funeral in Dundee costs £3,377 – the joint highest in Scotland<sup>9</sup>**.

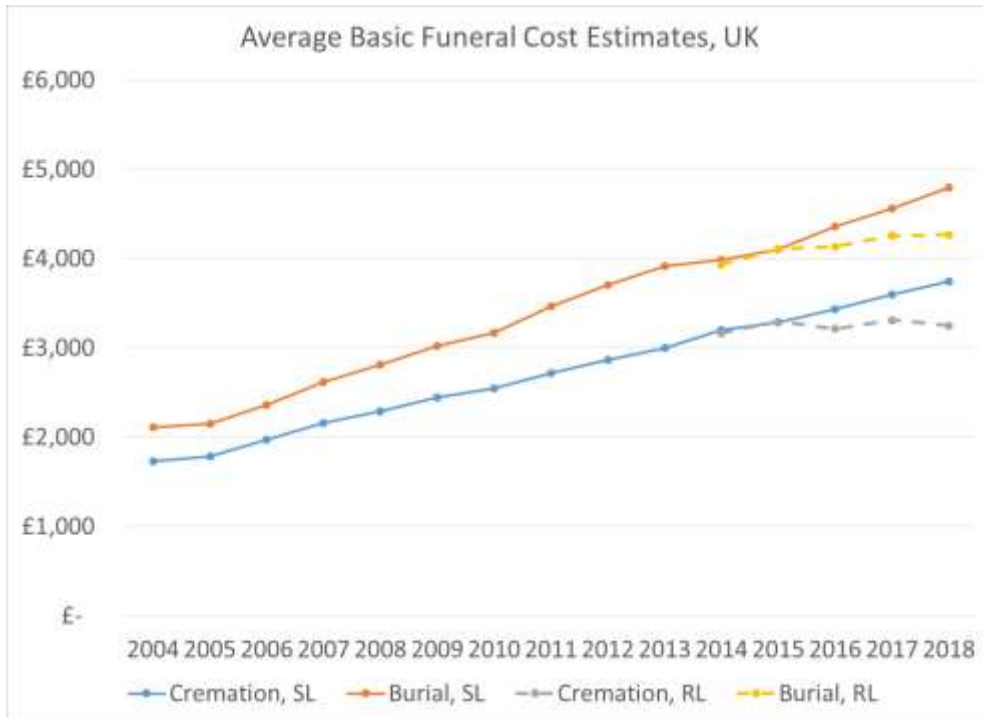
### Changing Funeral Costs

The cost of funerals has increased by 122% since 2004 – an average of 5.9% per annum (source: Sunlife 2018). Royal London have figures for the last 5 years only and these show a different recent story – of costs slowing down in the last 12 months, which they note could be partially due to decreases in costs from Funeral Directors. This comparison data is not available at a Scottish or Dundee level.

<sup>8</sup> Royal London do not give estimates for Scotland alone. Estimating using just a mean of all the Scottish locations would give a figure of £3,919 average Scottish burial funeral cost. Royal London estimates tend to be lower than SunLife estimates presumably because of inclusion of different aspects for a 'simple' funeral.

<sup>9</sup> Royal London do not give estimates for Scotland alone. Estimating using just a mean of all the Scottish locations would give a figure of £3,079 average Scottish cremation funeral cost. Royal London estimates tend to be lower than SunLife estimates because of inclusion of different aspects for a 'simple' funeral.

**Average basic funeral cost estimate, UK, 2004-2018**



Source: Sunlife, 2018, Royal London, 2014, 2015, 2016, 2017, 2018

The CMA (2019: 11) note long-term and above-average price increases across funeral director fees, cremation fees and burial fees.

**3.2 Dundee Funerals**

**Funeral Directors**

It is difficult to compare prices easily across providers even within one city. One method is to use comparison sites. The table below shows a comparison of pricing information available through comparison websites ‘Beyond Life’ and ‘Your Funeral Choice’ for Dundee. The two sites generally show different amounts for the same company.

The figure given by Your Funeral Choice for funeral director fees includes: meetings, paperwork and running the funeral; collection of the deceased and care prior to funeral; hearse or appropriate vehicle for transport to the funeral; and a basic coffin. The fees do not include disbursements (burial/cremation costs, medical fees and celebrant fees) or flowers, memorial (venue etc), headstone or orders of service.

The Beyond Life figures separate off figures for Funeral Director fees from what is described as ‘Arrangement Fees’. The arrangement fees here include a wood, standard coffin, a limousine, a standard hearse and a celebrant. The two figures have been added together to give a comparable figure to the Your Funeral Choice figure. From assessing what each price includes, it would seem the Beyond Life total should be fairly similar to the Your Funeral Choice figure, except it also includes an estimate for a celebrant.

It is clear from the comparison here that the information available to the consumer is extremely confusing. Whilst some firms seem to have broadly comparable prices across the two sites, others – notably the

Dignity – have vastly contradictory prices. The ranking from least to most expensive also varies across the two sites. A fair amount of interrogation of the website has to be carried out to understand what is included in each price. Comparison websites do not seem to be providing much coherency or clarity.

Funeral Director	Multiple Group or Independent	Your Funeral Choice Prices (1)		Beyond Life Prices (2)	
		FD estimated fees	FD Fees	Arrangement fees *	FD + Arrangement fees
Affertons Funeral Care	Independent	£1,585	£715	£770	£1,485
Co-op Funeral Care	Co-op	Not on site	Not on site		
James Ashton & Son, Edward McHugh & Macgregors (linked Funeral Directors)	Independent	£2,150	£510	£965	£1,475
James L Wallace Funeral Directors	Purves	£2,300	£1,810	£970	£2,780
J&J Funeral Directors	Dignity	£1,695	£3,265	£1,490	£4,755
J Smeaton and Sons	Dignity	£1,695	Not on site		
Millar Family Funeral Directors Ltd	Independent	Not on site	£820	£895	£1,715
Robert Samson Funeral Directors	Purves	£2,300	£1,810	£970	£2,780
Sturrock, Comb & Davidson	Independent	£1,975	Not on site		

\* Includes: wood, standard coffin; 1 limousine, standard hearse, celebrant

1. Source: [www.yourfuneralchoice.com](http://www.yourfuneralchoice.com)

2. Source: [www.beyondlife.com](http://www.beyondlife.com)

Figures downloaded 27<sup>th</sup> March, 2019. NB Figures are subject to change and those given here present a snapshot.

Currently, there is also mixed availability online of pricing information from the funeral directors themselves. Some funeral directors provide a price for direct cremations, others add in information about ‘simple’ or ‘traditional’ funerals. Consultation found that as funeral directors provide a customised service, they feel it is difficult for them to provide ‘packaged’ prices as that would prevent them from providing extra services as required at need. As discussed in Chapter 2 this could be due to information asymmetries between next of kin and funeral directors or due to the structure of the market and market segmentation.

It is also very difficult to ascertain quality levels online. Quoting prices online obviously gives one view, but it is difficult to know what quality the prices reflect as discussed in Chapter 2. Quality and standards are currently being looked at by the Scottish Government’s newly appointed Inspector of Funeral Directors. While a Code of Practice is expected without a identifiable linkage to quality price comparison fails to provide next of kin with an explanation for price variations.

### Burial Fees

Within Dundee, the Local Authority burial charge was £1,924 in 2019<sup>10</sup>, which included the lair, title deed, perpetuities and burial. Additional fees apply to Saturday burials, headstones or memorials, or larger lairs. This is more than the Scottish average of £1,535<sup>11</sup> (in 2018 – the most recent available figures). Costs are

<sup>10</sup> source: <https://www.dundee.gov.uk/sites/default/files/publications/cemeteries1920.pdf>

<sup>11</sup> The Stirling Citizens’ Advice listings do not seem to include fees in Dundee for title deeds or perpetuity fees. The different fee structure set out by Dundee City Council is noted in the Citizens Advice Scotland 2017 document *The*



compared to those that could be paid at Angus as an option for residents of Dundee. However, these are even higher, at £2,895.60 – £1,292 higher than an Angus resident would pay. Alternatively, Cairnbrae Natural Burial Ground is to the north of Dundee provides a further burial option. Here total costs are £1,340 but do not include perpetuity fees as the land is kept more naturally than a landscaped cemetery. Charges are not made for cross local authority burials. Additional costs can also apply for tree plantations or stone laying.

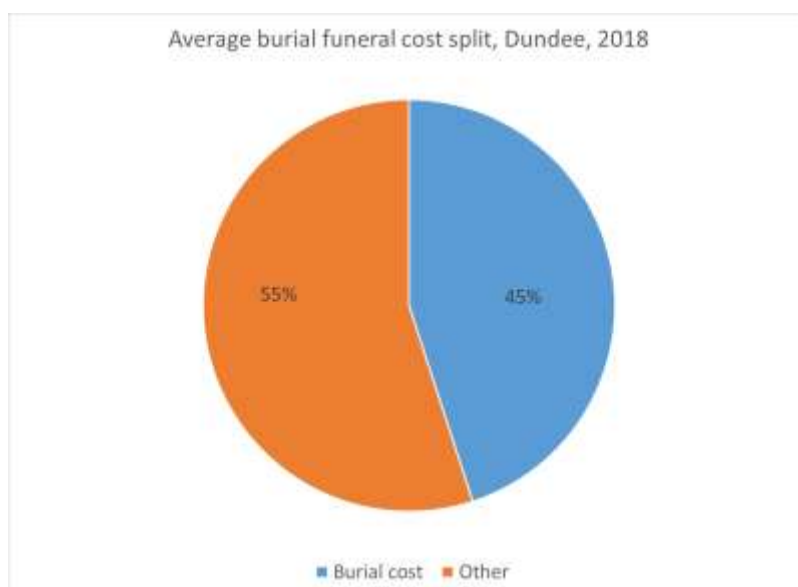
### Burial Costs, 2019

	Dundee	Scotland (2018 figure)	Angus non-resident	Cairnbrae
Fee for sale of lair	£656	£788.26	£1,246.90	£845
Fee for title deed	£69			
Fee for perpetuities	£632		£309.90	
Interment in purchased ground	£567 (over 18)	£746.76	£1,338.80 (over 17)	£495
<b>Total</b>	<b>£1,924</b>	<b>£1,535</b>	<b>£2,895.60</b>	<b>£1,340</b>

Source: Dundee City Council, Stirling Citizens' Advice Bureau *UNMARKED: Funeral Poverty and National Assistance Funerals in Scotland 2017/2018*, [https://www.angus.gov.uk/law\\_and\\_licensing/birth\\_civil\\_partnership\\_marriage\\_and\\_death/burials](https://www.angus.gov.uk/law_and_licensing/birth_civil_partnership_marriage_and_death/burials), <https://cairnbrae.co.uk/prices/>

Prices can be lower with traditional cemetery burial plots for some families, as once a lair has been purchased, this can be used for multiple family members. The number varies depending upon whether other members are buried, or if cremated ashes are being interred, and so the prices above compare the initial outlay including the whole lair.

Using Royal London estimates of £4,194 for an average low cost burial in Dundee and the 2018 burial price of £1,887, **the burial plot itself accounts for 45% of this total cost.**



The cost of Local Authority funeral plots has been repeatedly criticised within the research and highlighted in the media<sup>12</sup> (Stirling CAB, 2019: 10-14). The Scottish Government have supported improving the explanation around reasons for proposed changes to charges, and to use financial data, e.g. Local Financial Returns, to illustrate how fees contribute to the running of the service (Scottish Government, 2017: 11, Scottish Government, 2019b: 9).

*Cost of Saying Goodbye 2017* and these additional fees are not included. Given that these fees would have to be paid by someone wishing to be buried in Dundee, we do include these additional fees in our calculations.

<sup>12</sup> <https://www.bbc.co.uk/news/uk-scotland-44151702>,

## Crematoria Fees

The cost of a full adult cremation fee sits at £1,070 in Dundee at the privately-owned Dignity crematorium – this was the joint highest cost in both Scotland (see below) and the UK (out of 291 locations<sup>13</sup>) in 2018. Some locations have increased prices in the 2019 financial year (and are not included in the table), but the prices at Dundee have been kept the same.

### Crematoria Costs in Scotland, 2018

Rank 2018	Rank 2017	Rank 2014	Crematorium	Ownership	2018	Change 2017-2018
1	1	1	Dundee	Private	£1,070	£71
=	=	=	Moray	Private	£1,070	£71
=	=	=	Angus	Private	£1,070	£71
4	4	5	Holmsford Bridge, Irvine	Private	£950	£65
5	5	24	Highland	LA	£904	£34
6	7	11	Holytown	Private	£860	£60
7	6	16	South Ayrshire	LA	£848	£21
8	8	7	West Lothian	Private	£845	£45
=	=	N/A	Melrose	Private	£845	£45
10	10	n/a	Baldrroch	Private	£795	£0
			<b>Scottish Average</b>		<b>£781.61</b>	<b>£37.83</b>
11	11	6	Dumfries	Private	£775	£0
12	14	N/A	Houndwood	Private	£770	£50
13	13	10	City of Edinburgh	LA	£764	£29
14	16	8	Seafield, Edinburgh	Private	£762	£70
=	=	9	Warriston, Edinburgh	Private	£762	£70
16	22	15	Paisley	LA	£710	£85
17	19	13	Craigton, Glasgow	Private	£700	£48
18	15	17	Aberdeen City	LA	£693	£0
19	18	14	Fife	LA	£685	£22
20	27	23	Inverclyde	LA	£681	£95.30
21	24	21	Falkirk	LA	£669	£61
22	12	4	Perth and Kinross	LA	£668*	-£81
=	21	20	West Dumbartonshire	LA	£668	£26
24	25	19	City of Glasgow	LA	£650	£45
25	20	22	Argyll and Bute	LA	£647	£0
26	23	12	Glasgow Crematorium	Private	£625	£0
27	26	18	South Lanarkshire	LA	£617.38	£17.98

Source: Stirling Citizens' Advice Bureau UNMARKED: *Funeral Poverty and National Assistance Funerals in Scotland 2017/18*

\*£768 when include the abatement fee which is not included in the UNMARKED report

NOTE: Fees have been increased in some locations at April 2019 but not included here.

There are differences in the offering of the different crematoria. For example, Dundee offers 45 minute services (within an hour 'slot'), whereas Perth offers 20 minute for a service (also within an hour 'slot'<sup>14</sup>). There is, however, an option to extend the service slot at Perth to 40 minutes for an extra £100 i.e. £888

<sup>13</sup> Source: The Cremation Society of Great Britain <https://www.cremation.org.uk/content/files/CFLT%202018%20-%20Cremation%20Fee%20League%20Tables%202018.pdf>

<sup>14</sup> <https://www.pkc.gov.uk/article/20892/Perth-Crematorium-information-and-guidance>

total cost (at 2019 prices), which gives a two hour window within which to hold the funeral. Dignity crematoria use a price/minute measure of quality<sup>15</sup> following research showing customers value time over all other measures (Dignity, 2018a), with Dundee at £17.83 per minute, Perth estimated at £27.40 per minute. However, these figures are based on May 2018 and estimates using more recent prices suggest Perth is between £7.40 and £14.80 per minute<sup>16</sup>.

Some crematorium, including Dundee, also offer a breakdown of different prices. This does show that lower cost options are available, if the consumer is willing and able to take a different choice of cremation, such as earlier in the morning (£910 for a 9.30am service time in Dundee), or a direct cremation (£499 in Dundee for unattended, £675 for attended), or higher cost options are available over a weekend (up to £2,140 for a Sunday in Dundee). The CMA report sets out that there are higher levels of demand for cremation slots in the middle of the day, but suggest an early morning slot is not necessarily an option for many consumers e.g. if there are mourners who are travelling any distance or are elderly (CMA, 2019: 76). It has also been highlighted through consultation that it has been problematic that Dundee Crematorium has moved to hourly intervals for its cremations. This has reportedly reduced the number of available slots each week, which has raised problems in accessing a cremation slot, and increasing waiting times. It has also been reported that consumers would welcome a greater choice of prices at the crematorium – whilst lower priced options are available at a less sociable time, some people would prefer availability of a more sociable timeslot (during the middle of the day) for less time and a lower price. This is something that would be welcomed as a consideration for the crematorium to help reduce funeral costs.

Improvements in education would be helpful. For example, customers simply may not know there is a price differential between Perth and Dundee. For example, the difference of around £300 between Dundee and Perth Crematoria could potentially be sufficient to sway someone looking for a lower priced option to travel the extra distance from some locations within Dundee, particularly to the West. Whilst prices are displayed online, many people would not think about other options at this time unless they were highlighted. Anecdotal evidence suggests people generally would not contemplate going outside their locality for the funeral, particularly if this would prohibit the attendance of the funeral by other mourners.

The prices at Dundee are compared below to prices from another Dignity Crematorium, Houndwood, near Eyemouth. Whilst the direct cremation fees are fixed, users of Dundee can pay a premium of up to £600 for the same level of service. Whilst understanding the potential different running costs of crematoria in different locations for the business, and different levels of investment required it is not clear why such large differentials exist. With such high levels of deprivation in Dundee, high cremation costs are a driver of funeral poverty in the city.

There are lower-cost options available, such as direct cremation packages, which allow for a ceremony during sociable hours but the cremation to occur at a different time. However, the required high advanced payment requirements can prevent some lower-income families from being able to access these options.

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<sup>15</sup> <https://www.dignityfunerals.co.uk/arranging-a-funeral/planning-a-funeral/choosing-a-crematorium/>

<sup>16</sup> The figures are a little unclear. Based on May 2018 figures, the Dignity tool suggests Perth charges £822 for a half hour slot. However, our research has found the price at Perth is now £888 for 40 minutes service within an hour slot. Comparing Dundee with a 45 minute service within an hour's slot, and Perth with a 20-40 minute service within a 1-2 hour slot gives a cost per minute of £17.83 in Dundee and £7.40 - £14.80 per minute in Perth.

## Crematoria Price Breakdown, 2018

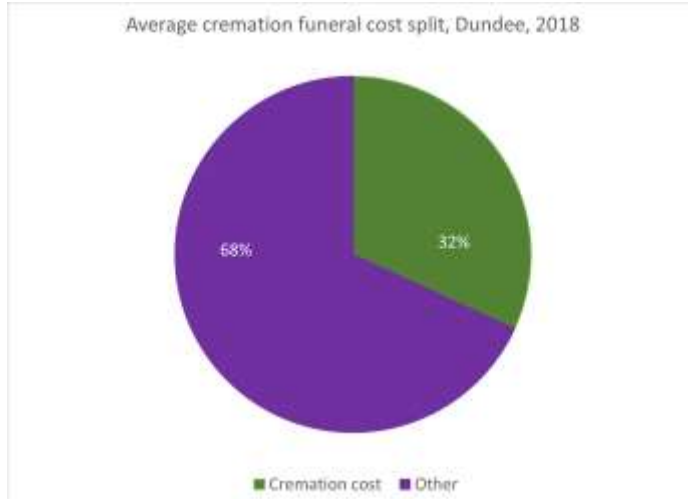
	Dundee Crematorium (Dignity-Owned)	Friockheim Crematorium	Eyemouth, Houndwood Crematorium (Dignity-Owned)	Dundee compared to Houndwood
Full adult cremation fee	£1,070	£1,070	£770	£300
Reduced Fee Cremation service (9.30am service only)	£910	Unclear		
Direct Cremation Fee – Attended (no service)*	£675	Unclear	£675	-
Direct Cremation Fee – Unattended (no service)*	£499	Unclear	£499	-
Saturday Service	£1,605	£1,570(am) / £2,050 (pm)	£1,155	£450
Sunday Service	£2,140	-	£1,540	£600

Source: Dignity <https://www.dignityfunerals.co.uk/media/3052/dundee-crematorium-price-list.pdf>, <https://www.dignityfunerals.co.uk/media/3017/houndwood-crematorium-price-list.pdf>

\* Direct Cremation is an unattended service at 8.15am or 8.20am with no mourners present. Direct Cremation (attended) allows a small number of mourners to be present, without a service. The Funeral Director will be required to deliver the coffin to the catafalque with sufficient bearers.

Whilst nearby geographically, Perth has not been included as a comparator here as it currently does not yet offer a direct cremation option; however, this is to be introduced in 2019 according to the Council representative on the Burial Inquiry line at Perth and Kinross Council.

**In Dundee using Royal London’s figures for an average low-cost cremation, cremation costs in Dundee amount to 32% of the total cost.**



Source: Royal London, 2018, Dignity

In addition to the cremation costs, consumers may also pay additional sums to then inter the ashes if they do not wish to scatter them. At a Dundee City Council cemetery, a lair and interment would cost £1,003. Cairnbrae charge £395.

### 3.3 Funeral Poverty

#### Definition

Funeral poverty has been discussed widely in recently years across the media, and within Government, describing the problem of paying for a funeral and resulting debt issues. A York University paper (Corden and Hirst, 2016) looked into the meaning of funeral poverty, and concluded the key constituents of funeral poverty are:

- *‘People’s expectations of a ‘funeral’, and what the person who takes responsibility wants to provide, and why.*
- *People’s inability to pay the costs.*
- *The economic impact of lack of affordability, in particular problematic indebtedness.*
- *Negative psychological and emotional constituents, including the impact on grief and experience of bereavement.’* (Corden and Hirst, 2016: iv).

#### UK level

Royal London (2018: 24) estimate 75,000 people struggled with funeral costs in 2018 (using 12% of respondents to their survey data reporting this issue) – down from 95,000 people in 2017. They suggest the amount of debt taken on by individuals struggling to pay for funeral costs is £1,744 – an increase of 4% compared to 2017.

#### Dundee level

**If we apply these figures to Dundee, the estimate of funeral debt is in excess of £0.5 million per annum in the City.** This calculation is set out in the table below and applies the Royal London’s figure of 12% of people struggling to pay, and adjusts this to reflect the higher proportion of deprived locations in Dundee compared to the UK average (meaning a likely higher proportion of people struggle to pay)<sup>17</sup>.

#### Funeral Debt Estimate in Dundee

Deaths in Dundee p.a.	1783	National Record of Scotland
% living in SIMD 40 % most deprived wards	57.5%	SIMD
% reporting struggle to pay for funerals	12%	Royal London, 2018, UK figure
Debt reported by those struggling to pay funeral costs	£1,744	Royal London, 2018, UK figure
Numbers struggling to pay in Dundee	307	Calculated, adjusted for deprivation levels
<b>Estimated funeral debt in Dundee</b>	<b>£535,931</b>	
Gross weekly earnings in Dundee	£507.50	Nomis
Gross weekly earnings in Scotland	£562.70	Nomis
Gross weekly earnings % Dundee compared to GB	90%	

It is possible that the debt reported by those struggling to pay funeral debt could be substantially higher in Dundee than the figure of £1,744 reported by Royal London. Gross weekly earnings are on average 90% the level of Scottish earnings, and given that total funeral costs in Dundee are amongst the highest in Scotland, **it is likely struggling Dundee families will see an even higher level of funeral debt than the £535,931 per annum reported here.**

Funeral debt was reported to be funded through a variety of methods by Royal London, including borrowing from family and friends (28%), taking on debt through financial services (21%), staged payments to the funeral directors (18%) or selling possessions (9%). Anecdotally, within Dundee, housing officers have reported people foregoing other areas of expenditure to help pay for the funeral e.g. going into rent arrears. Another public sector health professional said, *‘People feel ashamed of not being able to provide the funeral they want for their loved one. They will put themselves second – they won’t eat, or*

<sup>17</sup> 1,783 annual Dundee deaths x 12% struggling to pay x adjustment for higher levels of deprivation in Dundee (57.5%/40%) = 307 people struggling to pay x £1,744 = £535,931

pay for heating – to give their loved one the funeral they feel they deserve.’ It is not clear if going without the essentials was one of the potential response options within the Royal London study.

### Funding funeral debt, 2018

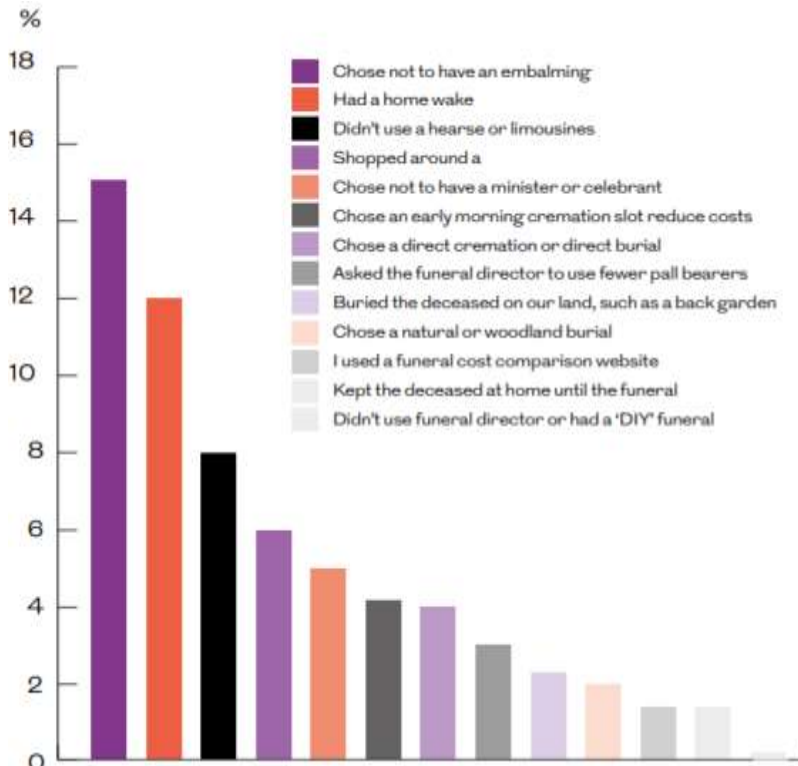
	Of the 12% that struggled to pay for a funeral, funeral debt was funded through:
Sold possessions	9%
Agreed to pay funeral director over period of time	18%
Took on debt (credit card/ loan/ overdraft)	21%
Borrowed from family and friends	28%

Source: Royal London National Funeral Cost Index Surveys, Royal London (2018)

Royal London also investigate steps taken to cut costs by people arranging funerals. These include: not embalming (15%), having a home wake (12%) and not using a hearse or limousine (8%). Interestingly, only around 1% used a funeral cost comparison site.

According to a Co-op Funeralcare survey (Co-op, 2018: 4), of the people who people who had arranged a funeral, 81% admitted to not having saved anything for their own funeral. It goes on to show 51% of people over the age of 70 haven’t saved anything for their funeral, and 4 million people had experienced financial hardship as a result of someone’s death. Sunlife (2018: 35) report from their survey that a third of next-of-kin had to contribute an average £2,559 to funeral payments in 2018.

### Coping strategies used to fund funeral costs, 2018



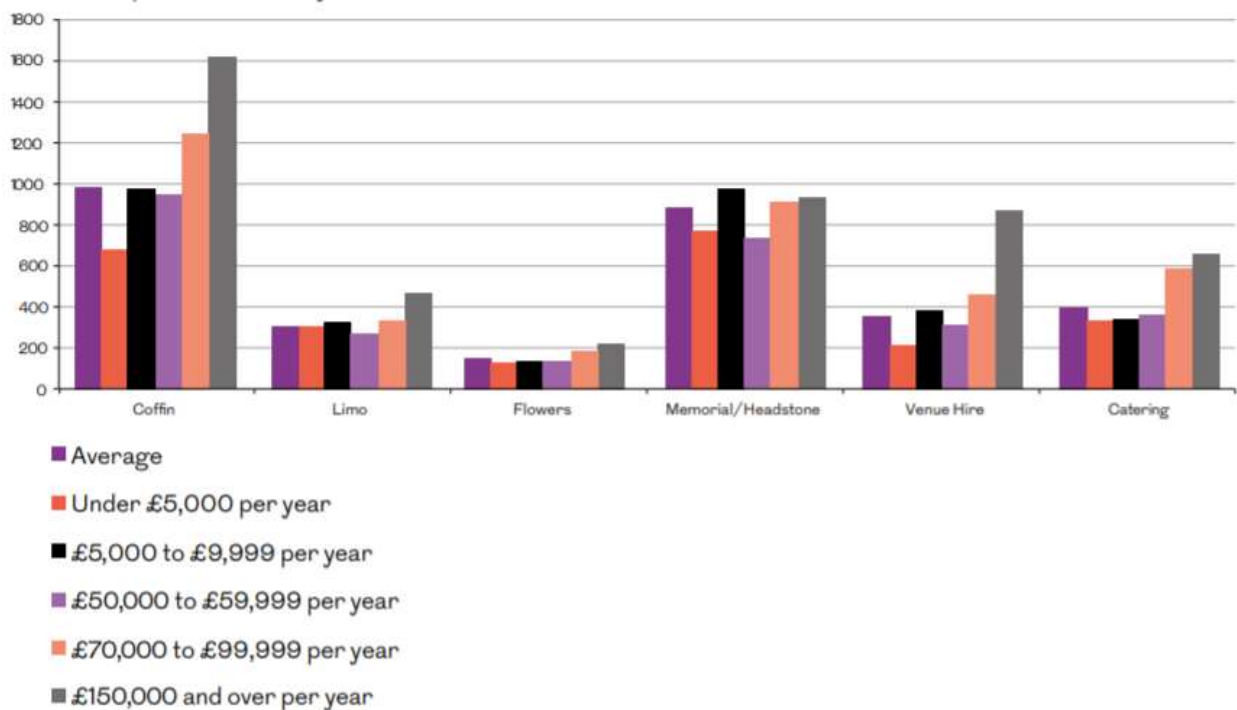
Source: Royal London National Funeral Cost Index Surveys, Royal London, 2018

## Funeral Spend by Income

A notable driver of funeral poverty lies in the problem of high funeral costs irrespective of income. As identified above in chapter 2 demand for funerals is inelastic and does not respond to price changes. For many of the components that contribute towards a funeral it is also inelastic with respect to income and does not respond to differences in income level.

The Royal London (2018) study gathers detailed data on funeral items' spend, split by household income. Interestingly, the findings show little difference in many aspects of funeral spending habits on what Royal London call 'discretionary items', split between households of vastly different incomes. It is important to highlight here that the household incomes shown in Royal London's chart are not uniform or contiguous. However, there are some important and interesting findings. The lowest income group (£0-£5,000) generally spend the least and more than a standard deviation lower than average spend for coffins and venue hire. The highest income group's spend is always highest except for memorials, where counter-intuitively the income group £5,000-£9,999 spent the most on average. (It is possible this can be explained by the data being skewed by a small number of very large spends.) However, in most other items, the three 'middle' income groups' spend falls within the standard deviation while there is little meaningful difference in spend between the groups who earn between £5,000 and £99,999 per annum.

### Spend on items by household income, 2018



Source: Royal London (2018)

The CMA report (2019: 7) notes that funeral costs can amount to nearly 40% of the annual expenditure of a next of kin on the lowest income decile. Such costs, if paid for purely from someone's income, will obviously pose significant financial difficulties.

Sheehy-Skeffington and Rea (2017: 20) explain how poverty affects people's decision making processes. They report findings of a greater level of impulsiveness and bias towards the present, the lower in income and education individuals are (Lehto *et al*, 2013), and this is heightened with feelings of relative deprivation (Callan *et al*, 2011) and feelings of anxiety (Zhao *et al.*, 2015) relative to their peers. These factors could potentially explain some of the higher spend by those on lower incomes with a bias towards current consumption, particularly at times of high anxiety such as a bereavement. Lastly, Johnson *et al.* (2011) report the issue of stigma attached to social class leading to problems of self-regulation. This could also help to explain the idea of spending similar levels on a funeral as someone on a much higher income. In practice, the CMA (2018: 20) notes that from their interviews, respondents in social categories C2, D and E were more likely to feel it was important to adhere to all the different elements of the funeral norm.

Royal London (2019) research found that even of those who had made a will, 26% did not want to discuss them because they did not want to think about dying and 27% of them did not want to upset the beneficiaries.

### 3.4 Average Costs, Social Fund payments and potential shortfalls

The chart below compares the average costs in Dundee for a low-cost funeral, a Respectful Funeral Service<sup>18</sup> and a 'full funeral', and demonstrates the shortfall in funding for even low income households successfully accessing the Social Fund Funeral Expenses Payments. Some conclusions are drawn below:

- Firstly, the Social Fund payment in Dundee does not always seem to cover perpetuity fees for a burial, meaning a potential immediate shortfall of £620 for anyone receiving the Social Fund payment<sup>19</sup>.
- With a low-cost funeral, as estimated by Royal London, the Social Fund payment leaves a shortfall between £1,607 and £2,227 (depending whether cremation or burial).
- The Respectful Funeral Service costs cannot be covered purely through Social Fund payments – leaving a shortfall of between £1,140 and £1,760.
- As shown above, the amount spent on a funeral does not vary significantly with income. The fifth and sixth columns below show Social Fund payments compared to the costs of a 'full funeral'<sup>20</sup> (plus the cost of a minister/celebrant which is not included in their fees). In this scenario the shortfall is estimated to be between £2,999 and £3,619.

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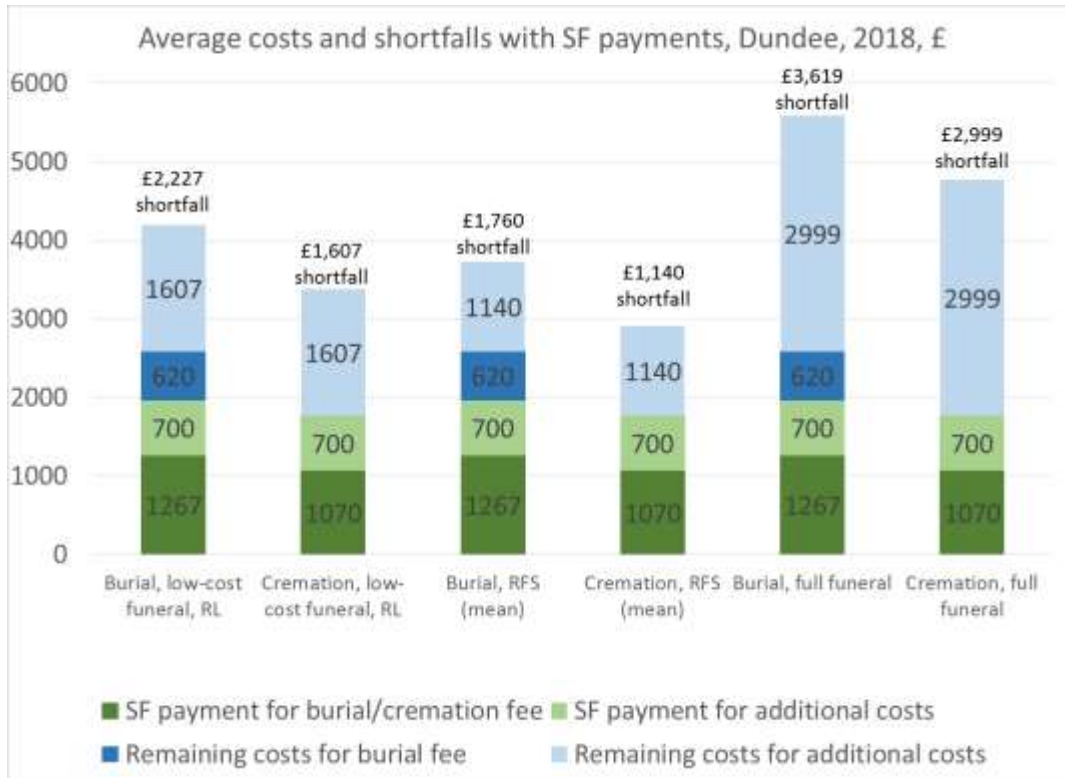
<sup>18</sup> The Respectful Funeral Service in Dundee is offered by four Funeral Directors, setting out a specific package with a fixed price, ranging between £1,775 and £2,130, excluding cremation or burial costs. See Chapter 4 for more details.

<sup>19</sup> It is unclear how much every Social Fund payment is worth – there is evidence from the funeral directors and Funeral Link that sometimes payments fully cover burial fees, and sometimes they do not.

<sup>20</sup> As advertised by Dignity – one of the few locations where a fuller cost of a funeral is set out on-line: <https://www.dignityfunerals.co.uk/funeral-directors/locations/scotland/dundee/dundee/22-30-perth-road>



## Estimated Household Funeral Debt for Social Fund (SF) recipients



Source: Low-cost funeral costs based on Royal London estimates for Dundee (2018), Respectful Funeral Service fee based on an average of the three providers in Dundee (<https://www.dundee.gov.uk/service-area/neighbourhood-services/environment/respectful-funeral-service>), Full funeral costs based on Dignity figure of £3,545 (<https://www.dignityfunerals.co.uk/funeral-directors/locations/scotland/dundee/dundee/22-30-perth-road>) plus the average cost for a Minister using Royal London figures (2018) of £154.

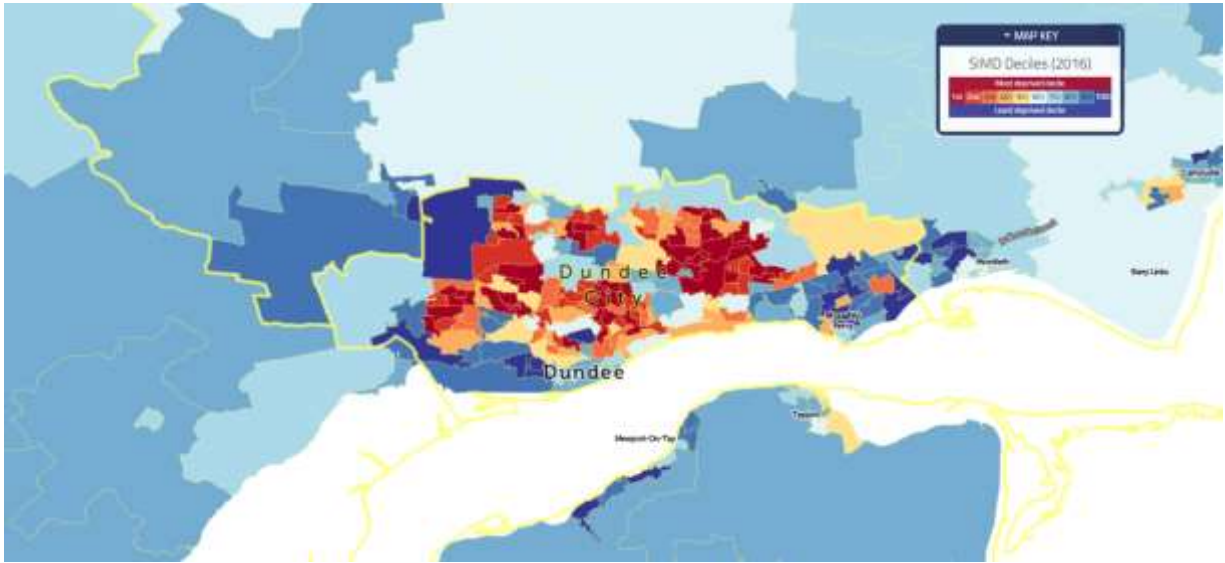
### 3.5 Funeral Poverty Indicators in Dundee

Data does not exist to give exact figures for the number of people who have fallen into funeral poverty in Dundee. However, socio-economic indicators for Dundee suggest an increased vulnerability to funeral poverty would be expected, whether the funeral is unexpected or not. These include higher levels of deprivation, higher unemployment rates, higher rates of households claiming benefits, higher rates of long-term sick, lower weekly gross earnings, higher rates of death, and a greater proportion of deaths from drugs compared to average Scottish levels and other Scottish city comparators. This suggests there are greater numbers of people already with lower levels of income and therefore likely lower levels of savings. Greater proportions of people have untimely deaths – notably higher proportions from drugs deaths.

#### Scottish Indices of Multiple Deprivation

Higher than average proportions of Dundee's population live in relative deprivation. Over 57% of Dundee's data zones (small, specific areas) fall within the 40% most deprived locations in Scotland.

## Dundee Scottish Indices of Multiple Deprivation Map

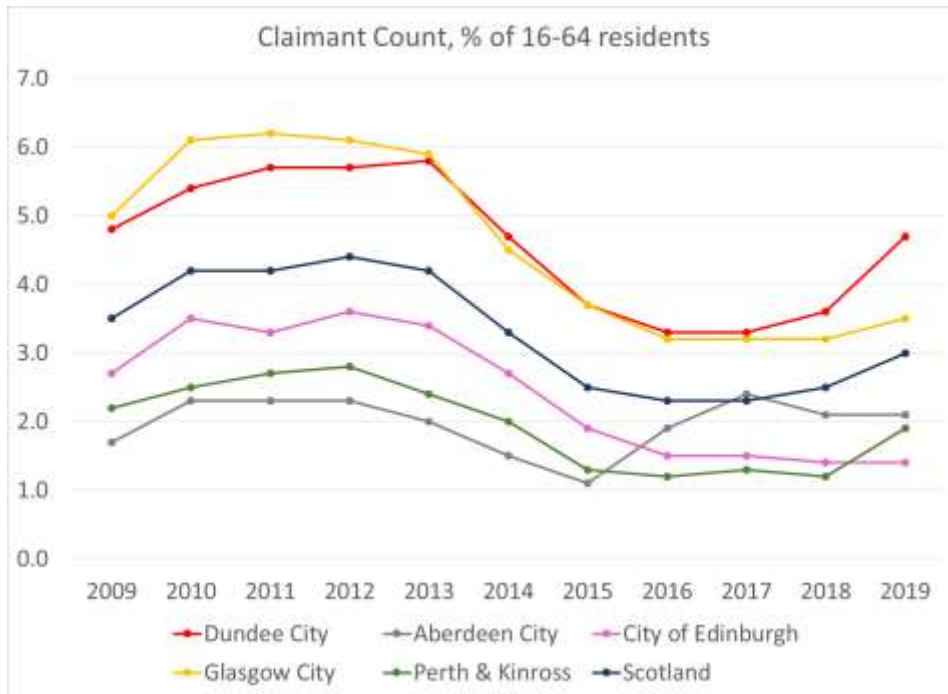


Source: www.simd.scot. Created by Oliver O'Brien and James Cheshire, UCL Geography. Data: Contains Scottish Government data. © Crown Copyright 2016. Base: Ordnance Survey. © Crown Copyright and database right 2011-2016.

Note: The 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> deciles show the 40% most deprived wards in Scotland.

## Unemployment rates

### Claimant count, 2009-2019



Dundee City's claimant count as a percentage of working age residents (age 16-64) is highest out of all the comparator areas, at 4.7% in 2018. It has consistently had one of the highest rates for the last ten years.

Source: Nomis

## Benefits rates

Within Dundee City, there are higher rates of individuals claiming Employment and Support Allowance (ESA) and incapacity benefits, as well as Job Seekers' Allowance and benefits for lone parents compared to the Scottish average and most of the other comparators (except Glasgow City).

### Benefits, November 2016

	Dundee City	Aberdeen City	City of Edinburgh	Glasgow City	Perth & Kinross	Scotland
job seeker	2.2	1.5	0.9	2.0	0.8	1.4
ESA and incapacity benefits	10.0	5.4	5.7	11.5	5.8	7.8
lone parent	1.3	0.6	0.6	1.2	0.6	0.9
carer	1.9	0.7	1.0	2.2	1.4	1.7
others on income related benefit	0.3	0.1	0.1	0.2	0.1	0.2
disabled	0.8	0.6	0.5	0.9	0.8	0.9
bereaved	0.2	0.1	0.1	0.1	0.2	0.2
unknown	-	-	-	-	-	-
Column Total	16.7	9.2	9.0	18.2	9.7	13.0

Source: Nomis

## Long-term sick

Dundee City has higher proportions of long-term sick, economically inactive residents compared to Scotland, and all other Scottish comparators.

### Economic inactivity, October 2017-September 2018

	Dundee City	Aberdeen City	City of Edinburgh	Glasgow City	Perth & Kinross	Scotland
Student	28.2	32.4	32.8	37.0	25.1	27.3
Looking after family/home	16.6	19.5	19.7	17.7	17.4	19.1
Temporary sick	1.4	2.2	1.9	4.3	!	2.5
Long-term sick	30.3	19.4	17.5	26.4	20.6	26.5
Discouraged	!	!	!	!	!	0.3
Retired	11.1	14.0	13.9	6.0	23.9	14.3
Other	12.0	12.4	14.1	8.2	12.1	10.0

Source: Nomis

! Estimate and confidence interval not available since the group sample size is zero or disclosive (0-2).

## Gross weekly earnings

### Gross weekly earnings, full-time workers, £, 2018

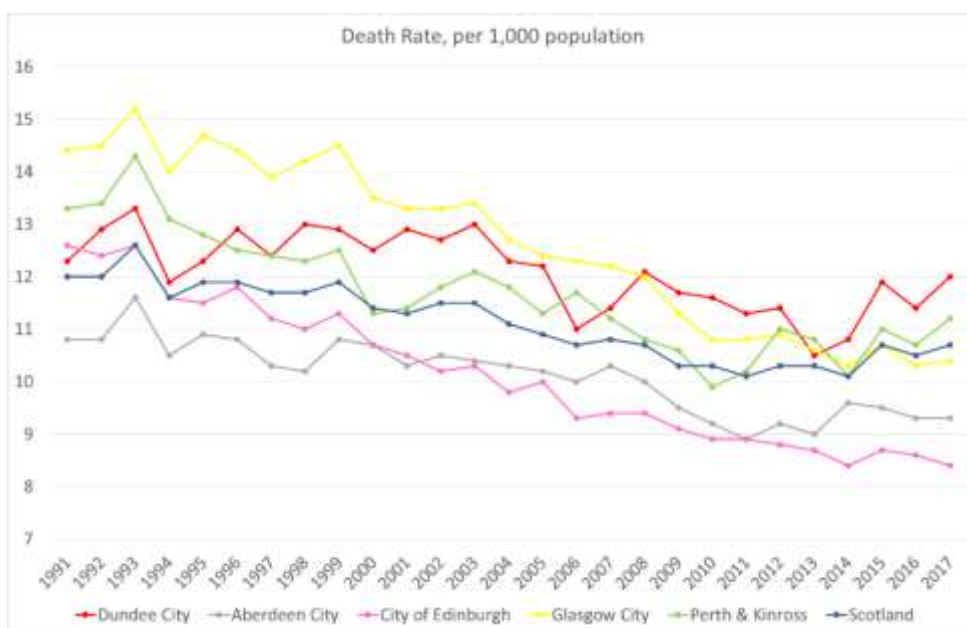
	Weekly pay - gross, £
Aberdeen City	578.3
City of Edinburgh	575.9
Dundee City	507.5
Glasgow City	548.6
Perth and Kinross	569.7
Scotland	562.7

Gross weekly earnings are notably lower in Dundee for full-time workers compared to all comparators in the table.

Source: Nomis

## Death Rates

### Death rate, per 1,000 population, 1991-2017



Source: National Records of Scotland

Dundee has high death rates. In 2017 there were 1,783 deaths in Dundee. Death rates (per 1,000 population) are higher compared to other Scottish cities and nearby Council areas, and the Scottish average. Whilst the general trend is for death rates to have been decreasing over the last 25 years, Dundee's rate has not changed significantly between 1991 and 2017, and in fact its death rates have increased the last four years. Dundee City has had higher rates than Glasgow City almost every year in the last decade.

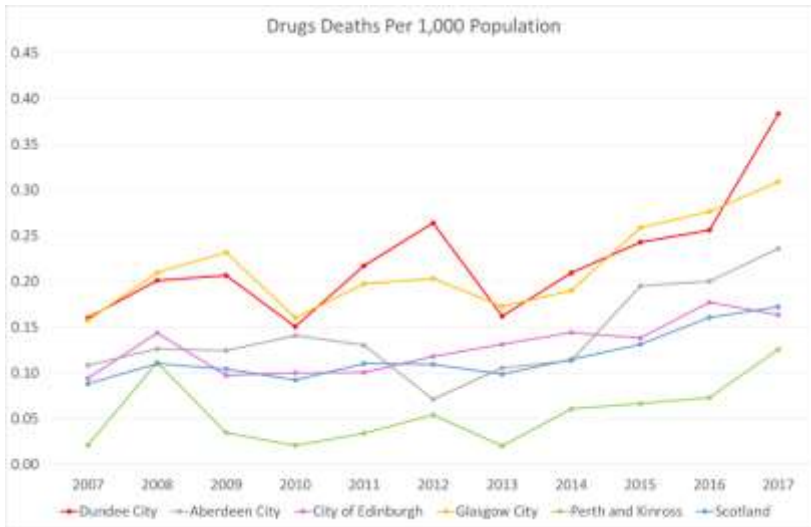
Compared to the Scottish average, there were higher proportions of deaths of young men (aged between 20 and 40).

### Deaths by age, % of total deaths, 2017

	2017	Age, % of total deaths				
		0-	20-	40-	60-	80-
Scotland	Persons	0.6%	2.2%	10.0%	37.1%	50.2%
	Males	0.7%	<b>3.1%</b>	12.3%	42.2%	41.7%
	Females	0.5%	1.4%	7.8%	32.1%	58.2%
Dundee	Persons	0.9%	3.6%	11.0%	35.7%	48.8%
	Males	1.0%	<b>5.7%</b>	13.5%	38.9%	40.9%
	Females	0.8%	1.4%	8.6%	32.4%	56.9%

Source: National Records of Scotland

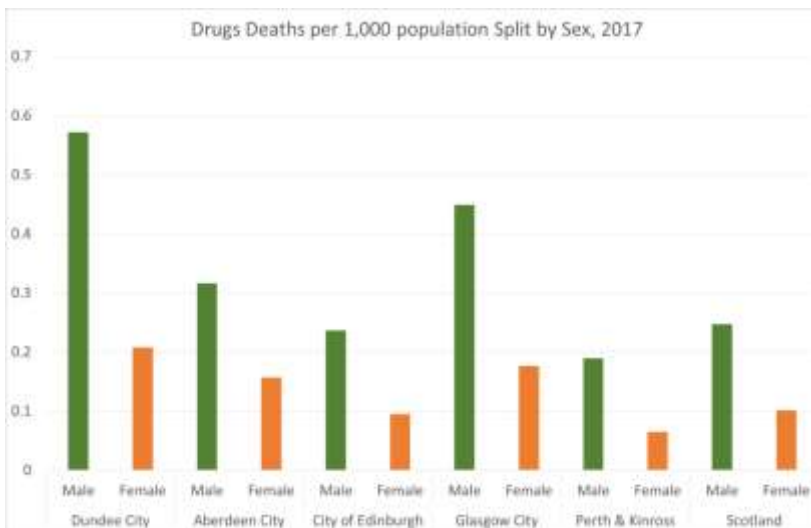
**Drugs deaths per 1,000 population, 2007-2017**



Unexpected drug deaths pose a particular problem of funeral poverty whereby an older generation, often no longer in employment incurs the cost of a funeral for a younger generation. Dundee City suffers higher drugs-related deaths per 1,000 population than the comparator cities and the Scottish average. This amounted to 57 deaths in 2017 in Dundee City.

Source: National Records of Scotland

**Drugs deaths per 1,000 population, split by sex, 2017**



Drugs-related death rate of males in Dundee is notably high.

Source: National Records of Scotland

**3.6 Conclusions**

Average funeral costs have on the whole been rising over the last decade. Dundee suffers from notably high cremation costs, and relatively high burial costs. There are few alternative options to local use of crematoria or burial grounds as the distance to alternative venues is relatively high. There is a mix of funeral director options and companies within Dundee, although it can be difficult to ascertain and compare prices in advance of attending a funeral directors' premises.

Funeral poverty is a noted problem, and relates to people's inability to pay for a funeral and results in low income households incurring high levels of debt. Anecdotal evidence within Dundee suggests people will forgo the essentials to cover funeral costs, and Royal London show taking on debt, borrowing, selling items

and funeral directors offering the option to pay over an extended time period as ways of paying. One notable problem highlighted in the literature is the high spend people will make on funerals, regardless of income level. Funeral debt in Dundee is estimated to be in excess of £0.5 million per annum.

Within Dundee, there are many indicators setting out the relative deprivation within the city, including higher unemployment rates, higher rates of households claiming benefits, higher rates of long-term sick, lower weekly gross earnings, higher rates of death and a greater proportion of deaths from drugs compared to average. This suggests there are greater numbers of people with lower levels of income and therefore lower levels of savings and disposable income. All these indicators suggest high likelihood of next of kin having insufficient funds to pay for an at-need funeral. Greater proportions of younger people having untimely deaths, cases in which older next of kin on fixed incomes are even more likely to have insufficient funds to pay for a funeral. Key groups that this impacts will be those who are on benefits and are entitled to Social Fund Funeral Expenses Payments, those on pensions or other benefits unable to access Social Fund Funeral Expenses Payments and households with low incomes who again do not have recourse to Social Fund applications.

Before examining the actions of Funeral Link in addressing funeral poverty the next chapter briefly sets out the policy framework the UK and Scottish governments have developed to the funeral sector.

## CHAPTER 4: Government Action

Problems of the funeral sector and costs have been widely noted in the media in recent years. As a result policy-makers have been investigating ways to address some of the issues, at both a local and national level. This chapter sets out the chronology of consultation and policy development at a national level – for both the Scottish Government and UK Government – as well as local policy developments within Dundee.

### 4.1 Scottish Government

#### Funeral Poverty Policy

The Scottish Government has been aware of the rising costs of funeral cost and issue of funeral poverty for several years and has been working to address the problem for a number of years. It is widely recognised as leading on initiatives to address funeral poverty within the UK policy context. It's report 'The Cost of Saying Goodbye' was commissioned in 2015 to investigate rising costs. The Scottish Government subsequently set up a Funeral Expense Assistance and Funeral Poverty Reference Group to support policy development, and this group still runs to date.

The Burial & Cremation (Scotland) Act 2016 is the Government's key Act on funeral policy. The 'Funeral Costs Plan' of 2017 formed the basis for Scottish Government actions to address funeral poverty and improve the availability of more affordable funeral options, and was consulted on between August and November 2018. Consultation on Funeral Expense Assistance Regulations was carried out between May and August 2018, exploring the administration of payments through the Scottish Government's devolved power due for publication in the summer 2019.

Guidance on Funeral Costs was published by the Scottish Government in May 2019. This sets out a wide range of recommendations for burial and cremation authorities, as well as funeral directors. Burial and cremation authorities are encouraged to use clear language and be transparent in terms of displaying fees in a range of locations and clarifying the ranges of options available. It is also recommended that funeral directors use clear language, and display prices clearly in a range of locations (including at the premises, with paper copies to take from the premises, and online). The guidance encourages funeral directors to give the full range of price options for each purchasing decision, and give itemised estimates (specifying which costs are for third parties) and final accounts. It is suggested a 'simple funeral' could be included as a clearly priced option available, which would include (in summary): funeral director's services, arrangements, staff for the deceased, a robust lined coffin, transportation of the deceased from place of death, care of the deceased prior to the funeral, viewing of the deceased, a hearse, and a service at the crematorium or cemetery. Local authorities are encouraged to engage with the public when developing charging proposals for burials and cremations, and explain reasons for proposed changes to help public understanding – potentially referring to Local Financial Returns. Local Authorities are also encouraged to consider payments in stages for pre-purchase of burial lairs.

A full chronology of commissions and actions from the Scottish Government is listed in Appendix 3.

#### Inspectors of Crematoria and Funeral Directors

The Infant Cremation Commission and the Report of the National Cremation Investigation led to the recommendation for inspection of the industry and potential regulation to be kept under review. The Statutory framework for the appointment of a Scottish Inspector of Funeral Directors, as well as the

introduction of a licensing scheme (should that be found to be appropriate), are both set out in the Burial and Cremation (Scotland) Act 2016.

An Inspector of Funeral Directors was also appointed in July 2017, and a programme has been running to carry out a critical appraisal of the work of funeral directors, assess whether the Infant Cremation Guidance has been implemented, and make recommendations on the regulatory landscape, including whether licensing should be introduced. The work of the Inspector focuses very much on standards and quality, with five priorities set out in the Annual Report 2017-2018<sup>21</sup>: culture, ethos and confidence in management; conveyance and care of the deceased; understanding, recording and acting on the wishes of the deceased or bereaved both pre or at time of need; asset management; and audit of procedures, practice and record keeping. The Inspector of Funeral Directors' report and recommendations are expected for publication in 2019 and will be in the format of a Scottish Government Code of Practice for Funeral Directors.

The HM Inspector of Crematoria was appointed in March 2015, as part of the recommendations from the Report of the Infant Cremation Commission published in June 2014. This Inspector focuses on quality and standards in crematoria across Scotland.

#### Funeral Support Payment

Through implementation of its new Funeral Support Payment, once the administration of the Social Fund Funeral Expenses Payments is devolved to the Scottish Government in 2019, proposes to widen the eligibility of claimants (increasing eligibility to apply by around 40%), to increase the flat rate of expenses payments each year in line with inflation, and streamline the application process. This will be supported through approximately £2 million in additional funding from the Scottish Government.

Whilst welcomed by many through the consultation of this study, there have been criticisms that the £700 funding is too low, and that Government support will still not help those with some income and who do not receive benefits, but who are unable to afford a funeral, such as the 'working poor'.

#### Incentivised Savings

Action 9 of the Scottish Government Funeral Costs Plan set out the intent to develop a Scottish funeral bond. This was mooted as an incentivised savings product, potentially in partnership with credit unions, and with the aim of encouraging individuals to save in advance for a funeral. The Scottish Government also carried out market research, anticipating a pilot scheme for testing by Autumn 2020. The Scottish Government published research findings on 9<sup>th</sup> June 2019 about the pilot scheme (Scottish Government, 2019c, 2019d, 2019e). This research found a broad support for an Incentivised Funeral Savings Scheme (IFSS), but proposed limits on government contributions (£120, £250 and £400) were not felt to be enough to incentivise saving. There were also concerns that the target demographic would have insufficient funds, with little disposable income already. Credit unions were perceived to be a credible delivery partner for the schemes. Recommendations include: increasing awareness of funeral costs, savings and insurance options; initiate measures to contain the increase in funeral costs; reduce barriers to participation in the IFSS; assess the demand for credit unions in poorly-served locations; and consider piloting alternative approaches to the IFSS (Scottish Government 2019e: 4).

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<sup>21</sup> <https://www.gov.scot/publications/inspector-funeral-directors-annual-report-2017-18/pages/1/>



## 4.2 UK Government

### Competition and Markets Authority

The Competition and Markets Authority (CMA) is carrying out a market investigation, looking at funeral director services at the point of need, as well as crematoria services. An interim report was published in November 2018, proposing the funeral market should have a markets investigation reference. A further short consultation was held to gather views on whether the markets investigation should include the funerals provided by pre-paid plans. A final report published in March 2019 set out their decision to carry out an in-depth Phase 2 market investigation into the supply of services by funeral directors at the point of need, and the supply of crematoria services.

### Treasury Pre-Paid Plans Consultation

HM Treasury carried out a consultation between June and August 2018 regarding pre-paid funeral plans. They were concerned that self-regulation within this industry was insufficient to ensure the fair treatment of consumers. The consultation aims to allow the Government to design a new framework. This will help people who are planning a funeral in advance.

### Funeral Payments

The UK Government currently administers Social Fund Funeral Expenses Payments (SFFEP) through the Department for Work and Pension (DWP). This fund can help to pay for some of the costs of the following: burial fees, cremation fees, transport to the funeral, cost of moving the body, and death certificates. The fund can be paid to claimants who receive one of a restricted number of qualifying benefits<sup>22</sup>. There are exemptions to receipt of the benefit, which can include a close relative of the deceased being in work<sup>23</sup>. The payment will also pay up to £700 for other funeral expenses e.g. funeral directors' fees, flowers or the coffin. Circumstances dictate how much payment a person may receive e.g. if there is other money from the estate to cover costs.

Problems with the DWP administered SFFEP are widely noted (e.g. Royal London, 2018: 30-33). The £700 payment has not increased since 2003, meaning its value has decreased significantly in real terms. Royal London suggest the average shortfall between what is covered by the SFFEP and the cost of a funeral is at least £1,500 and Stirling Citizens Advice Bureau suggest it could be up to £2,719 (see Appendix 4). The disparities in the gap between payment and funeral cost can also vary depending on geographic location (and resulting differences in Funeral Director fees) and the type of funeral (burial or cremation).

## 4.3 Local Government

### Respectful Funeral Services

Local Authorities have also begun to attempt to look at ways of tackling problems of funeral poverty. Within Dundee, Dundee City Council proposed to work with Funeral Directors to introduce a Respectful

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<sup>22</sup> These benefits include: income support, income-based Job Seekers' Allowance, income-related Employment and Support allowance, Pension Credit, Housing Benefit, the disability or severe disability element of Working Tax Credit, Child Tax Credit, or Universal Credit. The claimant must be: the partner of the deceased when they died, a close relative or close friend of the deceased, the parent of a baby stillborn after 24 weeks of pregnancy, or the parent or person responsible for a deceased child who was under 16 (or under 20 and in approved education or training).

<sup>23</sup> See <https://www.gov.uk/funeral-payments/eligibility>

Funeral Service, following identification of this option in Stage 1 of Dundee's work on Funeral Poverty, and the successful introduction of a similar service by East Ayrshire Council.

Dundee City Council launched its Respectful Funeral Service in April 2019. Four local Funeral Directors have agreed to offer this service, setting out a tailored 'funeral package'<sup>24</sup> which includes:

- Collection of the deceased from within Dundee
- Care and preparation of the deceased
- A choice of coffin ranging from light or dark wood effect or environmental
- A place of rest and viewing facilities
- A hearse and one family car
- Arrangements on the day of the funeral

Additional services can be added in. The funeral is designed to be '*dignified and professional but still affordable, providing an alternative choice to consider for your departed friend, relative or loved one.*' The Funeral Directors' packages put forward offer savings of approximately 20-34% compared to the Scottish average cost for Funeral Directors' services, between £1,775 and £2,130. The costs do not include burial or cremation fees.

#### Credit Unions

There is potential for short-term loans to be made available to individuals through Credit Unions. For example, within Dundee, in the past Discovery Credit Union have been able to offer 'Discovery Loans' of £400 to non-members, who may need a short-term loan to help cover funeral costs, such as a deposit.. Discovery Credit Union has been working with the Dundee Funeral Poverty Action Group to understand the best ways to help, and introduced a larger loan of £800. Discovery Credit Union also offer free life savings insurance with their savings accounts, meaning the savings balance will be matched upon death. This offers increased help to the families of people with savings accounts at the time of death which could be used towards funeral costs. Other Credit Unions also exist who could provide assistance with loans and savings. As set out earlier in the Chapter, at a national level the Scottish Government are also working with Credit Unions to understand the best ways of delivering an IFSS.

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<sup>24</sup> <https://www.dundee.gov.uk/service-area/neighbourhood-services/environment/respectful-funeral-service>

## CHAPTER 5: Funeral Link

### 5.1 Proposal for the Social Enterprise

The Dundee Funeral Poverty Action Group partners applied for funding through the Scottish Government/ European Union Social Innovation Fund Stage 2. The application<sup>25</sup> focuses on the idea for a social enterprise to pilot a model that would provide:

- *'An **advisory service** to provide immediate support to those who have been bereaved to consider the choices available to them **before** they make decisions that may lead to high costs &/or debt.*
- *A **funeral brokerage service** where [the social enterprise] will negotiate with funeral professionals to purchase the chosen elements within the individual's budget.*
- *A **money advice** service with a focus on supporting clients to access affordable finance options including specialist Credit Union loans and, if eligible, to assist them in applying for the Funeral Payment.*
- ***Signposting** to additional support services including bereavement counselling, money advice, employability and training etc.'*

The service was to be office and telephone based, with outreach services to deprived communities across the city. The social enterprise was to work closely with funeral directors and others in the sector to provide choice for bereaved families. The choice could include key decisions, e.g. between cremation and burial, or smaller decisions e.g. coffin type, flowers, funeral cars, memorial service options etc. It was discussed at this time that the social enterprise could negotiate on behalf of the bereaved clients to organise an affordable and dignified funeral.

### 5.2 Rationale for Funeral Link

Chapter 2 sets out the problems for consumers and funeral directors within the funeral sector and areas of market failure. Funeral Link specifically aims to improve the problems with information asymmetry. One of the specific aims of Funeral Link is to provide information to bereaved clients. By providing information about prices and options, the information asymmetry for the bereaved is lessened. The bereaved also have more time to consider their options in the surroundings of Funeral Link and do not need to make an immediate purchase. Funeral Link also has no incentive to seek a profit from the bereaved, and so will be able to give independent and objective advice based on the clients' needs and affordability levels.

In addition to this, Funeral Link has worked to increase the visibility of funeral poverty within Dundee, as well as the level of discussion around the need for thinking about funerals before the time of need, and the availability of different options for those who are arranging an 'at-need' funeral. This helps to address the difficulties next-of-kin face in not knowing the wishes of the deceased and feeling obliged to overspend to 'give the send-off they deserve'.

### 5.3 Funeral Link: Set up and Practicalities

This section sets out the chronology of the progress of Funeral Link.

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<sup>25</sup> European Social Fund Social Innovation Fund Stage 2 Application, Dundee Partnership, *Tackling Funeral Poverty in Dundee through Social Enterprise*

- June – November 2018

The project was initially co-ordinated through a development worker who worked administratively to: liaise with the Charity Constitution, to establish Scottish Charitable Incorporated Organisation (SCIO) (SC048691); find premises; organise communications and banking infrastructure; write and advertise job descriptions for the manager, support workers and marketing officer; determine priorities and the monthly timeline; and disseminate information to stakeholder groups.

- November – December, 2018

The manager of the Funeral Link service began work on 5<sup>th</sup> November 2018, a marketing officer started on 11<sup>th</sup> November and two support workers joined the team on 18<sup>th</sup> November. The manager and marketing officers are full time positions, and the two support workers worked 3 days' per week each, with some crossover for training and initial set-up. The initial development officer left the project in early December 2018 after handing the project over to the manager and rest of the team in November 2018.

The manager is accountable to and managed by the Chair of the Board, and they manage the charity and staff team. The Board comprises six Trustees who have a broad range of management, third sector, corporate and local knowledge and experience. The service manager meets formally with the Board on a monthly basis and individually with other Trustees as required.

**Management:** The initial focus of the manager was the practical set-up of the organisation, some of which used the expertise of Board Members, including: the establishment of the constitution of the Scottish Charitable Incorporated Organisation (SCIO); the staff receiving a handover and reviewing the outcomes the charity has been set, understanding the finances, and understanding/reviewing decisions taken prior to the manager starting the position; researching local organisations for networking and awareness; researching the literature base; accommodation appraisal; organisational tasks, such as HMRC, bank account, pension, staff handbook etc; and an initial Board meeting.

The accommodation in particular posed a challenge for the social enterprise. It was initially based at the Dundee Central Library within the Wellgate Shopping Centre. Although well-linked by the bus network and accessible, there was a lack of space for private meetings, and the shared workspace was in an open plan office, posing difficulties managing privacy and data security, particularly with the potential for very private and distressing phone calls. The option of office space at the Scotty Centre in Stobswell was found, and site visits carried out. The centre had a suitable office, plus the option of some breakout space in a smaller room for private meetings. It was accessible, and on various bus routes, and a discussion was held around the fact the support team could go out to visit clients unable to access the centre. An options comparison was put to the Board in November 2018 and it was agreed that the social enterprise would pursue options to move to the Scotty Centre, subject to budgets and contract agreements. The lease for the Scotty Centre was agreed in December 2018 and furniture and technology requirements organised. Some time was spent working out budgeting of the project given the shorter time-frame compared to the original plan.

**Marketing:** Marketing work focussed on brand and logo development, as well as initial work on the organisation's website. The agreement was made to re-brand the service as 'Funeral Link' as there was some potential confusion with the previous name of 'Dundee Funeral Support Service'.

**Networking:** A Scottish Government funeral costs consultation event held in November 2018 was an early opportunity to meet many key contacts involved in funeral poverty within Dundee and Scotland including

representatives from Dundee City Council, Scottish Government, Dundee Pensioners' Forum, Discovery Credit Union, University of Dundee and faith representatives.

Throughout December the social enterprise staff members were involved in staff training, as well as meetings with the Steering Group and members involved in the set-up of the project, including Faith in Community, University of Dundee, Dundee City Council, Dundee Social Enterprise Network, and Dundee Pensioners' Forum. Links were made with community centres to start promoting the service and discuss the best ways to work together. Meetings were held with Dundee Registrars, Citizens' Advice Bureau, CONNECT Service (part of Council Advice Services), the Spiritual Care team at Ninewells Hospital, the Department for Work and Pensions, and Bereavement Support at Boomerang (a community organisation in Stobswell). Presentations were made to a Church of Scotland Presbytery meeting and the Eagles Wings Trust (a charity to help those who are homeless and/or experience of substance use/addiction).

Concurrent to this work, Faith in Community and the Dundee Funeral Poverty Action Group met with Funeral Directors in Dundee to discuss projects ongoing in Dundee.

- January – March, 2019

**Management:** Funeral Link moved into their accommodation at the start of 2019. Some time was spent discussing the possibility of budget re-arrangements and measures of success. A Trustee/Staff planning day was held to agree targets and milestones for the service. Skills of the Board members were discussed with specific responsibilities then given out. Funeral Link have agreement with around ten community spaces to support clients in 'their' community if they feel more comfortable meeting there rather than going to the Scotty Centre.

**Marketing:** There was a strong focus on marketing from a print and digital perspective, particularly at the start of this time period. Promotional designs were finalised and copies can be found below. The promotional materials had dual purposes and were therefore in two different styles:

1. 'Profile-raising/discussion designs': The first five designs use familiar, funeral-related colloquial phrases, combined with brightly coloured illustrations intended to generate audience impact. These aim to promote awareness of and discussion around funeral poverty within Dundee. Funeral Link details are included on the back.



2. 'Information design': The second style of design was more factual in terms of what Funeral Link aims to do and how to contact the team – for bereaved clients to receive from partners such as the NHS and the Registrars.



Print-based promotional materials were finalised, ordered and printed, including as roll-up display banners, A4 posters and A6 postcard size leaflets illustrated with the designs discussed above. Posters and postcards were distributed across Dundee, at a range of community centres, libraries, Council facilities, Housing Associations and so on. Corporate stationery was also printed, including letterheads, business cards, PowerPoint presentations, branded pens, name badges, signage and general administrative documentation e.g. client referral forms. This all helps to signal to clients the cohesiveness and professionalism of Funeral Link. A4 and A6 posters were also printed using the 'information design' for distribution to the bereaved and in situations where the discussion designs might be considered inappropriate. The NHS Bereavement Team agreed to include an information design leaflet in the Bereavement Packs which are given to every bereaved next-of-kin.

Digitally, social media assets were developed in this period, including Facebook (<https://www.facebook.com/funerallinkdundee/>), Twitter (@funerallinkscot) and the website (<https://funerallink.org.uk/>). The team began to post information on the Facebook site and Tweet in January. Articles about Funeral Link were published in local newspapers, The Courier and Dundee Evening Telegraph, and they received publicity through University of Dundee articles in The Conversation and The Scotsman. Interviews were held with local radio station, Wave FM, on the launch event day. See Appendix 5 for a list of media articles.

**Networking:** Meetings were held with representatives of the community centres, Discovery Credit Union, a local bereavement consultant, some local funeral directors, Caledonian Cremations, Police Scotland, Victim Support, Dundee Carers Centre, the Bereavement Team at Ninewells Hospital, Fuze Celebrants, two professional will writers, Taught by Mohammed and Coats and Quilts. The manager networked successfully at Glasgow Film Festival, meeting representatives of Pushing Up the Daisies, Caledonian Cremations, Final Fling, and the producer of the film 'Dead Good'.

The Funeral Link service held its official launch on 1<sup>st</sup> March 2019. 35 guests attended, including local Councillors, representatives from the NHS, local Funeral Directors, Discovery Credit Union, members of Dundee Funeral Poverty Action Group, the Board, representatives of the faith community, and local community groups such as Boomerang and Positive Steps.

**Funeral Link began to receive clients from January, through referrals. The number of contacts has steadily grown as knowledge of the service has grown. The referrals are discussed in more detail in the next section.**

- March – June, 2019

This period has been focussed on service delivery. Referrals have come from a broad range of organisations across the city confirming the success of the impact of Funeral Link's marketing. These include: Dundee City Council (communities officer, social services and community centre), Hospice, NHS social prescribing, Maggie's, Victim support, Police, Hospital pack, Registrars, Funeral Director, Sheltered housing warden, Gowrie care, GP surgery and self-referrals.

37 individuals/families have been supported during this period.

21 of these have been assisted with funerals (Outcome 1 in the table below) and all 21 of them lived in the SIMD 40 areas within Dundee. 10 of these 21 families saved a total of £10,382 following Funeral Link support.

Additional financial support has been received from local clergy enabling Funeral Link to:

- reduce the burden of debt for an individual whose wife's funeral was held prior to our service commencing.
- support a mum to travel to her daughter's funeral elsewhere in the UK
- support a grandson to travel to his grandmother's funeral elsewhere in Scotland
- Applications were made to local and national trusts for contributions towards the funeral debt of individuals with limited success to date.
- 4 of these clients successfully received funds from their social fund applications and 5 are still awaiting the outcome.
- 3 individuals received clothes for funerals from local clothing projects with our support.

Funeral link directly supported 2 clients to successfully access the Social Fund Funeral Expenses Payment when they had previously given up hope.

- 16 of those supported with a range of advice related enquiries (Outcome 2a) which included the following:
- 8 sought pre-funeral help for themselves or a close family member which included funeral planning and the associated costs, Wills and Power of Attorney.
- 6 of the 16 were anonymous enquiries and of the remaining 10, 6 of them were known to be in the SIMD 40 areas within Dundee, one was from another council area.
- 9 of the 16 were seeking financial advice and 3 were seeking emotional support.

Funding of £35,964 has been secured from Trusts and Grants to sustain the charity until at least 1<sup>st</sup> Nov with longer-term bids submitted to the National Lottery Community Fund and the Scottish Government Investing in Communities Fund.

**Marketing:** The Funeral Link manager met with Natalie McKail (SG Inspector of Funeral Directors), Joe Fitzpatrick (SG Minister for Public Health, Sport and Wellbeing) and further meetings are planned with Aileen Campbell (SG Communities Minister), local MSPs and Elected Members of Dundee City Council.

Funeral Link participated in 'Good Death Week' attending two death cafés, organising our first 'forget-me-not' lunch for previous clients and others and attended a parliamentary reception in Edinburgh hosted by Good Life, Good Death, Good Grief and Golden Charter.

During the 'forget-me-not' lunch opportunities were made available for previous clients to informally share their experiences of our service with staff and elected members from Dundee City Council.

One of Funeral Link's clients volunteered his time to make a wreath for funeral link which has already been used by two clients saving them money on flowers and also providing the original client with improvements to his self-worth during his own bereavement.

Funeral Link staff visited Caledonia Cremation's base in Glasgow and laid the foundations for a constructive partnership approach. One of their clients to date has been supported jointly by Funeral Link and Caledonia Cremation resulting in them receiving significant savings on their funeral choice for their loved one.

**Networking:** Significant networking effort has continued during this period with further discussions with local organisations and presentations at relevant groups to improve awareness of Funeral Link service. Leaflets and posters have continued to be distributed to a range of places. Additional banners have been purchased and are moving around the city in prominent workplaces, community centres and libraries to help raise awareness.

Progress has been made with funeral directors and other funeral professionals. Constructive meetings have now been held with all funeral directors operating in the Dundee area. A collaborative meeting was held with senior management representatives from Dignity which included discussions about and a visit to their crematorium. Four funeral directors have shared their back office operations with Funeral Link.

#### 5.4 Measures of Success

The measures of success of the project are agreed in the grant offer letter from David Cowan (Head of Regeneration, Scottish Government) to Peter Allan (Community Planning Manager, Dundee City Council), dated 5<sup>th</sup> June 2018. The measures of success are listed in the table below.

The service manager's first quarterly progress report in December 2018 (Q2) noted the challenge of meeting the milestones, given the manager was supposed to be in place for 12 months and support workers for 10 months.

The quarterly progress report in March (Q3) reports the progress with agreeing the measures of success. In early January the manager spoke with a Scottish Government employee regarding concerns around the reduced timeline during which the support service would be live, the impact of this on the outcomes and the process for requesting changes to timeline and staffing. Reassurance was received that the agreed outcomes within this grant are not 'must do' and that the journey should be evidenced with successes and challenges along the way.

Subsequent to this, a request was submitted, but not accepted, to extend the timeline to the end of July within the current budget. A second request was submitted and accepted to increase hours of one of the support workers to full-time March-June, and to extend the Marketing officer contract to June, along with



minor adjustments for the two other staff members, enabling to maximise the outcomes within the time available.

The Q3 report sets out comments on each of the measures of success, with successes and challenges to date along with suggested pro rata realistic targets relative to the service being operational for 3 months rather than 9. These outcomes were reviewed by staff in early January and discussed at the Staff/Trustee away day on 11<sup>th</sup> January for further discussion pending the decisions about the resources and timeline from Scottish Government. The suggested revised targets are set out below, alongside the original suggestions. Funeral Link and Dundee University did not receive a response on the proposed adjustments and so the analysis below uses the proposed revised measures of success. The rationale for changing the targets is set out in Appendix 6.

### Measures of Success – Original and Revised

		Original	Revised target
<b>1</b>	<b>Funerals undertaken with help from social enterprise within the target population of at least 400 families who suffer bereavement within the SIMD 40 areas of Dundee during the project period</b>	50	17
<b>2</b>	Individual advice to 50 families suffering bereavement living within SIMD 40 areas of Dundee during the project period	50	
	<b>Individual advice to families within the SIMD 40 areas of Dundee who enquire about all things related to funerals during the project period</b>		17
<b>3</b>	<b>Deliver 4 outreach events to local groups of pensioners</b>	4	4
<b>4</b>	<b>Deliver 4 wider community outreach events</b>	4	4
<b>5</b>	<b>Achieve 80% success rate of Social Fund applications made with support from Dundee Funeral Support Service</b>	80%	80%
<b>6</b>	Project will generate approximately £6,100 commission income over the project period	£6,100	Other avenues being investigated
<b>7</b>	Reduction in number of local authority funerals from its current level of approximately 20 National Assisted Funerals each year	<20	Longer-term goal
<b>8</b>	Partners will achieve an initial reduction by 25% of funeral debt advice cases dealt with by Dundee CAB and other advice providers	<25%	-

### 5.5 Measures of Success Evaluation

A summary of the monitored measures of success are set out below, covering up to 10<sup>th</sup> June 2019 – the length of the SIF grant.

## Measures of Success

		Target	Actual
1	Funerals undertaken with help from social enterprise within the target population of at least 400 families who suffer bereavement within the SIMD 40 areas of Dundee during the project period	17	21
2	Individual advice to families within the SIMD 40 areas of Dundee who enquire about all things related to funerals during the project period	17	16
3	Deliver 4 outreach events to local groups of pensioners	4	4
4	Deliver 4 wider community outreach events	4	18
5	Achieve 80% success rate of Social Fund applications made with support from Dundee Funeral Support Service	80%	100% of those received back, awaiting results of some applications.

*1) Funerals undertaken with help from social enterprise within the target population of at least 400 families who suffer bereavement within the SIMD 40 areas of Dundee during the project period*

The table below sets out summarised information about the individuals Funeral Link has been able to assist in its first three months of running. The information is summarised to retain anonymity.

## Summarised Funeral Link Assistance Areas

Total clients	21	100%
SIMD40 area	21	100%
Pre-funeral help	14	67%
Financial advice sought	17	81%
Administrative advice sought	6	29%
Funeral organisation assistance sought	14	67%
Signposted/referred on to:	10	48%
- Financial support	11	52%
- Emotional support	9	43%
- Clothing support	3	14%
Helped with Social Fund application	9	43%
Helped with additional grant applications	7	33%

Source: Funeral Link

There have been 21 clients who have sought assistance with funerals – all of whom were from within the SIMD 40% most deprived zones in Scotland. **Funeral Link have met and exceeded their adjusted target.**

**Funeral Link role:** 14 of the 21 clients were at a pre-funeral stage. The Funeral Link team listen to the clients, discussing options and offering a breakdown of typical costs for each element. There will be a

discussion of choices between burial, cremation and direct cremation. Additional costs will also be discussed, including transport, flowers, funeral wake and newspaper notifications. The focus is to give choice to meet the needs of the client both emotionally and financially and find the best fit.

Five clients were struggling to pay for a funeral that has already taken place. In this circumstance, Funeral Link can offer to assist with Social Fund Funeral Support Payment applications, refer on to money advice services, apply for a grant on behalf of the bereaved, and longer-term potentially apply for restricted funds to assist with funeral debts.

**Referral sources:** Referrals to Funeral Link so far have been from a variety of sources, which include: self-referral (information coming from a leaflet, a GP surgery, the internet, and a friend); Communities Officer; Social Services; Roxburghe House staff; NHS Social Prescribing Team; Maggies; Lochee Hub; Victim Support; sheltered housing warden; Funeral Director; Gowrie Care; Dundee Police; and the hospital pack. The broad range of referral sources shows the success of Funeral Link's marketing and promotions within the Healthcare and Social Work sectors, as well as their own marketing. It is anticipated that referrals will also increase through word-of-mouth referrals now Funeral Link is established and client numbers are increasing.

**Advice:** The table shows the diverse kind of advice required and support given by Funeral Link. Many (81%) clients sought some level of financial advice, including the costs of organising a funeral, sources of funding or grants, and financial differences between different types of funeral. Some clients required administrative support, such as with certification of death. Funeral Link offered support and advice to every person who contacted them, and made many attempts to contact clients who had been referred on.

**Referral/signposting on:** Funeral Link referred 14 of their clients to other agencies for further support or help, including emotional support within the faith community, financial advice with Connect, and support to find clothing for the funeral. This range of referrals demonstrates the complexity of organising a funeral, and the need for a broad range of stakeholders for Funeral Link. It also shows the breadth of skills and expertise required by Funeral Link staff.

From the support given, it shows Funeral Link's ability to give relevant advice to clients before they incur further debt or with further problems. Through the consultation process, particularly with housing officers and debt and legal advice professionals, it has become apparent that funeral debt problems can be the source of a more longer-term financial problem. This is not always initially recognised as a funeral debt problem. **It is very likely that by assisting individuals with problems at the time they arise, they can avoid the need for further financial or legal support further.**

Funeral Link has reported the problem of wanting but not being able to assist clients. For example, after meetings have been arranged, the client may not turn up, or a client may ignore advice and continue with a higher priced funeral. This can be for a variety of reasons, such as the client being in a particularly vulnerable group, such as suffering from substance misuse, or from not having a fixed point of contact, or resulting from cultural issues of continuing to use the same funeral director as elderly relatives. Access to some of the households is not easy, and there can be disagreements within the families around responsibility for organising the funeral. Staff at Funeral Link have worked hard to support clients as best they can, following-up missed meetings, or trying to locate vulnerable clients at places of support.

However, in a small number of circumstances, they have been unable to help because the client did not want the support.

Staff have been trained in active listening, ensuring they work effectively alongside their clients. The ethos is to help the clients believe they can and do have the resources within themselves to help themselves become more resilient. Staff have the cultural competence to work with individuals regardless of their situation, enabling the staff to create trusting relationships with their clients.

### *2) Individual advice to families within the SIMD 40 areas of Dundee who enquire about all things related to funerals during the project period*

Funeral Link has assisted sixteen clients who have come to them for advice on funeral planning. Funeral Link provides assistance to explore their wishes and help make informed choices for financial support, such as funeral plans, Wills and Power of Attorney, as well as emotional support and signposting to clothing and substance abuse support. Funeral Link has piloted ideas with these initial clients to establish what they find useful information. Funeral Link was also able to refer one client to support for their substance abuse. **Funeral Link have almost met their adjusted target.**

In addition to these cases, the Funeral Link manager and support staff have provided information and advice to almost **370 people** through their outreach events, in the form of discussions at and following presentations they have made to various organisations and community groups (see Measures of Success (3) and (4)). These are not included in the figures for Measure of Success (2) but do all inform the debate and information shared within Dundee. It is very likely people left these events contemplating their own positions regarding funeral planning, as well as those of their next-of-kin. These impacts are important but unquantifiable.

### *3) Deliver 4 outreach events to local groups of pensioners*

**Funeral Link has fulfilled the outcome of four events delivering outreach events to local groups of pensioners. The number of people estimated to have been engaged amounts to 87.**

- i. Funeral Link presented to Dundee Pensioners' Forum on 4<sup>th</sup> December 2018 (20 people).
- ii. Funeral Link presented to the West End Community Spirit Action Group at the Tullideph Sheltered Lounge on 3<sup>rd</sup> April 2019 (20 people).
- iii. Funeral Link spoke at the Age Scotland /Dundee Voluntary Action event on 25<sup>th</sup> April 2019 (25 people).
- iv. Funeral Link organised the Boomerang lunch event on 13<sup>th</sup> May 2019 (22 people) as part of Good Death week.

### *4) Deliver 4 wider community outreach events*

**Funeral Link has held 18 outreach events, more than quadrupling their target of four from the measures of success, and amounting to more than an estimated 280 people with whom they have engaged.** In addition to this list, Funeral Link staff members have met with individuals and businesses for networking, mutual understanding and promotional meetings – details of these are included in the 'Influencing Role' section later in this chapter.

- i. Funeral Link attended a Church of Scotland Presbytery meeting in December 2018 (20 people).
- ii. Funeral Link met the Social Prescribing team at Douglas Health Centre in December 2018 (10 people).

- iii. Eagles Wings Trust hosted Funeral Link in December 2018 (10 people).
- iv. The service met with the Cairn Centre on 23<sup>rd</sup> January 2019 (10 people).
- v. Funeral Link attended Dundee Carers Centre on 12<sup>th</sup> February 2019 (10 people).
- vi. A Faith in the Community awareness session was held on 26<sup>th</sup> February 2019 at Kirkton Community Centre which Funeral Link presented at (25 people).
- vii. A Roxburghe House meeting on 27<sup>th</sup> February 2019 was attended by 5 people.
- viii. The service visited Lochee Community Hub on 11<sup>th</sup> March 2019 to make connections in the community (5 people).
- ix. Coldside Parish Church welcomed the service on 14<sup>th</sup> March 2019 where Funeral Link carried out promotions (50 people).
- x. The service networked at an event at Kirkton Community Centre organised by Taught by Mohammad on 14<sup>th</sup> March 2019 (15 people).
- xi. Funeral Link presented to Citizens Advice Bureau volunteers and staff at a team meeting on 20<sup>th</sup> March 2019 (30 people).
- xii. Funeral Link attended an event at The Steeple Church in Dundee on 21<sup>st</sup> March 2019 (30 people).
- xiii. The SSAFA – The Armed Forces Charity, Dundee welcomed Funeral Link to their AGM where the manager presented their work on 2<sup>nd</sup> April 2019 (20 people).
- xiv. Funeral Link presented to Brooksbank Money Advice Team on 29<sup>th</sup> April 2019 (7 people).
- xv. Funeral Link attended the NHS Health and Social Care strategic meeting at Dudhope Castle on 14<sup>th</sup> May 2019 (10 people).
- xvi. Funeral Link worked with the Financial Inclusion Strategy Group from Dundee City Council in May 2019 (12 people).
- xvii. The Community Health team hosted Funeral Link at the Mitchell Street Centre on 28<sup>th</sup> May 2019 (10 people).
- xviii. Funeral Link hosted the Macmillan Money Team at their Scotty Centre premises on 29<sup>th</sup> May 2019 (3 people).

Royal London (2018) suggest that given three quarters of deaths occur in some kind of institution rather than at home (just under half in hospitals), these institutions play an important role in providing information to a significant proportion of bereaved next-of-kin through bereavement packs (including booklets *'When someone has died – information for you'*). Funeral Link add significantly to the offering to the bereaved in terms of advice provision. Through meetings and attendance at in-house training days to raise awareness about their service, Funeral Link have ensured their service is known about for staff to be able to signpost and refer them on from many of the institutions within Dundee.

#### *5) Achieve 80% success rate of Social Fund applications made with support from Dundee Funeral Support Service*

Nine of Funeral Link's clients have been supported in their Social Fund applications, either directly completed by Funeral Link, completed by Funeral Directors after support from Funeral Link, or through other people (e.g. family members) after advice from Funeral Link. Four of these applications have been successful and the outcome of five are, as yet, unknown. **Of the responses received, 100% have been successful.** Funeral Link will follow-up the remaining five to ascertain success rates.

Funeral Link has started to assist clients directly with completing Social Fund application forms, as Connect have indicated they have insufficient capacity to continue with these applications.

In addition to this, Funeral Link has been consulted by officers from the Scottish Government on the design of the new Funeral Support Payment Assistance which is to be introduced across Scotland in the coming months, and will replace the DWP Social Fund Funeral Expenses Payments. This shows the established position of Funeral Link and expertise garnered by its staff.

#### *6) Project will generate approximately £6,100 commission income over the project period*

Funeral Link have secured £35,964 in further funding through grant applications which will allow them to continue to function until November 2019. Financial support has been sourced from Dundee City Council's Common Good Fund, 'Good Life, Good Death, Good Grief', Northwood Charitable Trust, Souter Charitable Trust and Roberston Trust. The Trustee Board recognised early on the potential conflict of interest Funeral Link would create if it sought commission on advice for bereaved families. Appendix 6 explains in detail the reasoning for by Funeral Link not pursuing direct income generation in this measure of success. Instead Funeral Link has sought to generate income from grant funders and savings for clients. There have been a number of areas in which Funeral Link have saved costs for some clients, including the use of silk flowers in place of buying a bouquet, and the pro bono provision of the function of a celebrant by one of Funeral Link's Board members.

#### *7) Reduction in number of Local Authority funerals from its current level of approximately 20 National Assisted funerals each year*

Funeral Link estimate their support has helped three clients to organise a funeral, which otherwise may have resulted in a Local Authority or environmental funeral. These have been facilitated through pro bono or reduced cost provision coordinated by Funeral Link and supported by a local celebrant, funeral directors and funeral companies. Stirling Citizens Advice Bureau (2018: 29) shows costs of Local Authority funerals amount to an estimated £438.83 to the Local Authority, suggesting Funeral Link have saved around £1,316 to Dundee City Council.

### 5.6 Savings resulting from Funeral Link actions

**Funds raised:** Funeral Link have set out summarised information about where they have facilitated savings to their clients. **In total, this amounts to £10,382.40 from ten clients.** The amounts saved for a client vary from £25 up to £3,140. The areas within which savings have been made include: receipt of Social Fund Funeral Expenses Payments where applications would not have been made in the absence of Funeral Link; grants received from outwith Funeral Link (e.g. from the faith community); savings made through Funeral Link providing advice on the range of funeral choices available, and clients choosing a cheaper funeral option; savings made through Funeral Directors offering choices in the provision; pro bono provision of celebrant services by a Board member; and use of Funeral Link's silk flowers rather than buying a bouquet.

There are five clients who are awaiting results of Social Fund applications and so further savings to clients could be achieved; two of these clients are included in the ten above who have already made some savings.

**Scenarios:** Four scenarios are set out below to estimate potential savings to vulnerable clients through the work of Funeral Link. They show a range of potential impacts:

**Scenario 1:** This assumes Funeral Link retains the current number of clients per week (1.5 per week based on 21 in 14 weeks). Projected over a year and assuming Funeral Link helps one in three clients (lower than the current rate), and with savings of £900 to clients they are assumed to help, an annual saving of £23,400

is possible for vulnerable clients. This is the very lowest estimate to show a baseline and is a conservative estimate compared to current rates of assistance.

**Scenario 2:** The number of clients assisted is assumed to increase to 2.5 per week, reflecting a potential increase in support staff to 1.5 Full Time Equivalent (FTEs) jobs, and reflecting a smoother-running service now the support service is established and running well. Savings remain at £900 per client who saves, and a third of clients are assumed to save. This gives an annual saving of £38,700 to clients in Dundee.

**Scenario 3:** Clients assisted increases to 3.5 per week, reflecting an increase in support staff to 2 FTEs and a smoother-running service. Funeral Link are assumed to assist a third of those suffering bereavement and the resulting saving is £54,900 to clients.

**Scenario 4:** Clients assisted remain at 3.5 per week, but the scenario assumes current rates of client assistance – 48% - and the amount saved is shown at the current level of £1,038 per client. The amount saved overall is £90,680 – 17% of the annual level of debt within Dundee.

### Scenarios to show potential savings to vulnerable clients in Dundee

	Scenario 1	Scenario 2	Scenario 3	Scenario 4
	<b>33% helped, 1.5 clients per week</b>	<b>33% helped, 2.5 clients per week</b>	<b>33% helped, 3.5 clients per week</b>	<b>48% helped, 3.5 clients per week, higher savings</b>
Average debt in SIMD	£ 535,931	£ 535,931	£ 535,931	£ 535,931
Amount saved	£900	£900	£900	£1,038
FL Clients	21			
Weeks	14			
Clients/week	1.5	2.5	3.5	3.5
Projected clients/year	78	130	182	182
% helped	33%	33%	33%	48%
Clients saving money	26	43	61	87
<b>Amount saved p.a.</b>	<b>£23,400</b>	<b>£38,700</b>	<b>£54,900</b>	<b>£90,680</b>
<b>% of funeral debt</b>	<b>4.4%</b>	<b>7.2%</b>	<b>10.2%</b>	<b>16.9%</b>

Amount saved p.a. = Amount saved X Projected clients/year X % helped

Further economic savings will be made through:

- Funeral Link’s educational impacts on people making funeral plans before their death
- Funeral Link’s education impacts from people learning about funeral costs and choices
- Lifestyle impacts on individuals who have been assisted by Funeral Link and who are mentally more able to continue following a bereavement e.g. an earlier return to work
- Reduced costs to the NHS down the line of people who have been supported by Funeral Link at an earlier stage in the funeral process than they might otherwise have been, and have not needed recourse to more serious health or grief support
- Reduced costs to other support organisations who might otherwise have been contacted for support, and who may not have had the expertise required for such detailed knowledge around funeral provision (before a funeral) or ability to access the relevant funds or support (following a funeral)

- Knock-on effects of word-of-mouth sharing of experiences and education, which will provide savings to those who learn through talking to people who have directly worked with Funeral Link or attended an education session

These savings are in addition to the above estimates, and accrue both to individuals (through educational impacts and lifestyle impacts), and to the public purse through savings to the NHS and other organisations.

## 5.7 Case Studies

Some clients who have been assisted by Funeral Link have been re-contacted after a period of time to allow for reflection on their experiences, to discuss what impact Funeral Link had on their funeral plans, finances and mental health and well-being. The clients contacted were selected by Funeral Link staff, as they had good relationships with these clients, and felt their clients were able to respond to questions about their experiences without having adverse effects on their well-being. Funeral Link had developed good trust and rapport with their clients and it was felt they were best able to judge the survey sample and best placed to carry out the surveys as they have the relationship with the clients.

Dundee University operates an established Ethics Committee procedure for the involvement of research involving human participants. The questionnaires used by Funeral Link were developed collaboratively and in compliance with the University of Dundee Ethics Committee guidance. The University of Dundee Ethics Committee aims to ensure relevant and appropriate questions are asked of the clients, to ensure participants have full information on their ability to withdraw from the research, have informed consent in their engagement with the research and that no adverse impacts on emotional well-being is incurred. A key consideration of ethical regulation is the safeguarding of anonymity for participants and security of storage of all data both during and after the research ends.

Six clients were re-contacted. A higher number could not be obtained in time for reporting, either because it was felt to be too soon after bereavement, or because some of the vulnerable clients are uncontactable (for example, with no fixed address). All six clients were happy to respond.

### Case Study 1

The funeral had been organised prior to the client's meeting with Funeral Link, at a cost of around £4,000. Funeral Link suggested the family apply for Social Fund payments, which they did and subsequently received around £2,500. The client was also supported in accessing family finances, and the client suggests they would have been 'lost' without Funeral Link. There was no reported subsequent funeral debt.

*"I worry that if Funeral Link does not continue then what happens to people in funeral poverty? Who will help them? I am so grateful of the support of Funeral Link. They helped me access my husband's bank account to pay for the funeral and persuaded me to apply for benefits. I would have been lost without them. The phone calls to find how I was doing were such a good thing."*



*"I did not know the cost of funeral costs. Funeral Link helped me see that I had choices and could choose. The ongoing support has been amazing. I feel this service is so worthwhile."*

#### *Case Study 2*

A client contacted Funeral Link following a funeral which had already been arranged and carried out. The Funeral had cost £5,000 and they were looking for advice to help cover the costs. Funeral Link assisted with filling out a Social Fund application which is awaiting a result.

#### *Case Study 3*

Funeral Link assisted a client access grant funding to attend a funeral for a close family member elsewhere in the UK. They report they would have been unable to attend without this support. Funeral Link have also advised them to go to a listening service, as the client has encountered sleeping problems.

#### *Case Study 4*

Funeral Link were approached by a client who had an initial quote from what they describe as an 'expensive' funeral director, having not had any advice on different funeral options available to them by that funeral directors. Funeral Link gave them advice about choice existing in the market, which gave them confidence to change Funeral Directors to a cheaper service. The client also had a successful Social Fund application payment.

*"I was thankful of the support with the paperwork."*

*"I would have been lost without the support of Funeral Link. I would not have been able to attend XXX's funeral. I am so grateful."*

### Case Study 5

Funeral Link worked with a client to discuss different funeral options. The client then opted for a direct cremation, with a resulting funeral costing £1,600. Funeral Link has assisted the client in making a Social Fund application, which is awaiting a decision.

### Case Study 6

A client approached Funeral Link looking for help with their funeral debt of £1,500. The funeral had already taken place and they did not feel they had been given sufficient options with the funeral choices when decisions had been made. The funeral had cost £4,800 and they had paid an initial deposit of £1,200. They were now on a monthly payment plan with the funeral director. Funeral Link had signposted the client to the GP for further support and were able to help with a small donation to assist with payments. Funeral Link also applied for funding from a Trust but the application was declined.

### Health and Well-Being

All six clients report moving from a feeling of being 'extremely stressed' at the time of the bereavement about organising the funeral, to 'not at all stressed' following their consultation with Funeral Link about organising and not being able to pay for the funeral. They all report they would have been 'slightly more stressed' (1 in 6) or 'much more stressed' (5 in 6) without the support of Funeral Link.

Importantly, four of the clients reported that they did not have anyone to talk to about the funeral, and Funeral Link had filled this role. The remaining two clients had spoken to family. The importance of Funeral Link's listening and support role is shown in the comments above, with two clients suggesting they would have been 'lost' without Funeral Link. Funeral Link has referred clients on to support agencies.

*"If I had known about Funeral Link before the funeral, this would have been more of a support as all information would have been available. I had no idea what to expect! I did pay £200 for flowers and expenses were high due to cars and other extras."*

## 5.8 Influencing Role – Promotions and Prominence

Funeral Link has successfully promoted the discussion around funeral costs, poverty and options within Dundee and further afield. Interrogation of the social media channels shows some excellent results. Facebook has been used to raise localised awareness to local residents who may need Funeral Link's services. Twitter has been aimed at more national and international sector-related groups, as well as the local Dundee networks. Funeral Link also has a recently set-up Instagram account which is to be used for video content, pictures and networking, but this has not yet been fully utilised.

The Facebook page has 146 followers, 135 of whom are from Scotland and 76 within Dundee<sup>26</sup>. 74% are female and 24% male. The number of people seeing Funeral Link posts is boosted significantly by views

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<sup>26</sup> Data sourced 18<sup>th</sup> April, 2019.

and promotions of Funeral Link posts by other Facebook users who have shared Funeral Link posts. Through this, 2,069 people from Dundee (out of a total 3,335) have received posts from Funeral Link. The furthest reach so far on an individual Facebook post has been 4,291 people (2,203 organically including through 24 shares, and 2,088 through a paid boost) on a post promoting Dundee City Council's Respectful Funeral Service. A post showing the Funeral Link 'information design' postcard posted on 5<sup>th</sup> February reached 2,204 people and received 33 shares, from a range of faith groups, community organisations, charities and individuals. A promotional video following the Funeral Link launch has been viewed 545 times, and was shared by 11 individuals and organisations, including a Scottish alliance, 'Good Life, Good Death, Good Grief'. The page has been promoted by local Councillors, and commented on by local funeral directors.

Website traffic reached 558 visitors between March and June 2019, over 298 sessions. There have been 2,868 views overall. The website sets out practical information about what Funeral Link offers, a Frequently Asked Questions section, and clear contact details. There are sections which set out recent news, outlining some of the networking and fact-finding Funeral Link has carried out, as well as blog sections on 'Last Words' of funeral experiences in Dundee. Information on costs are included within the FAQ section, including specifics, such as for cremations and burials, as well as general information about what might generally be included.

The success of Funeral Link's local recognition was clear when an article appeared in a local newspaper about a homeless person in Dundee who needed support with funds to help pay for their partner's funeral. The story was published in the Facebook page of the Dundee Evening Telegraph. Funeral Link were recommended four times in the 'comments' section as somewhere the bereaved could go for advice by local members of the public. This shows clearly the message about Funeral Link is getting out around Dundee, and people are recognising the need for and use of this service<sup>27</sup>.

The Twitter feed has 62 followers (sourced 18<sup>th</sup> April 2019). These include a range of local community groups, local and national journalists and media organisations, national bereavement charities and pressure groups, national and local government officers, local funeral organisations, local Councillors, a local MSP, health workers, and individuals. Through Twitter, Funeral Link have clearly raised the profile of their work and the problem of funeral poverty at a national level, and they are interacting with relevant organisations and making important networking links.

### 5.9 Relationships with Partners and Stakeholders

Funeral Link have worked hard to form relationships with stakeholders and partners. This has been through:

- Meeting the key local stakeholders through individual meetings, as shown in the chronology section at the start of the chapter.
- Outreach events, as set out in Measures of Success (3) and (4).
- Training days with organisations, including the NHS, Roxburghe House staff, Citizens Advice Bureau volunteers and staff, Maggies and Macmillan nurses.
- Contacting all local funeral directors and firms with a national offering.

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<sup>27</sup> See <https://www.facebook.com/eveningtele/photos/in-todays-evening-telegraph-a-man-has-resorted-to-begging-on-the-streets-of-dund/2126815017367567/>

- Attendance of networking and educational events both locally and at a national level.

**Local Stakeholders:** Funeral Link have promotional mobile banners, which have previously been on display in The Crescent in Whitfield, Menzieshill Community Centre and Library and Dundee House. The banners are currently on display in Dundee Central Library, Charleston Community Centre and Douglas Community Centre, and one is due to be displayed by the Eagles Wings Trust. As discussed earlier, Funeral Link have agreement with around ten community spaces to support clients in their own community, demonstrating the breadth of support across the City.

The success of this networking is clearly demonstrated through the range of organisations who have made referrals to Funeral Link, as set out earlier in the Chapter. The networking interaction has helped inform other organisations of Funeral Link's plans, but also inform Funeral Link of the services they can offer in return. This is of benefit to Funeral Link's clients. For example, with clients coming to Funeral Link with funeral poverty issues it may become apparent that there are wider financial problems ongoing, and that an overall financial health check may be helpful. This allows Funeral Link to signpost and refer clients on to relevant organisations. There are some other organisations, such as money advice agencies and Funeral Directors, who already help apply for Social Fund Funeral Payments on behalf of clients, and Funeral Link are building relationships successfully to understand who can do this, and where other grants may be available.

One of the stakeholders quoted the need for this funeral advice as being '*essential*'. They went on to say '*There's a stigma about saying you don't have the money for a funeral. With Funeral Link you can go anonymously for advice and sign-posting, and get an idea of what your options are, and what they might cost.*'

Individuals were interviewed on Funeral Link's launch day, and a video prepared which was shared on the Facebook page. A stakeholder from Positive Steps – a faith-based Dundee charity which helps vulnerable adults – said about funerals: '*People are really in a lot of anguish about it. It's at a really difficult time and an awful lot of the time it's a vulnerable person who is trying to deal with the really difficult situation. It's awful for them and they don't have anywhere to turn. This is brilliant for them that this service is here now.*'<sup>28</sup>

On the same occasion, a Dundee Councillor stated: '*It's a benefit for people to have people who do actually understand what the funeral process is all about and I think it is important that we have something like this. It brings individuals who are having a really difficult time and takes the pressure away from them, giving them proper advice in a nice, comfortable environment. I think that's very important at a very difficult time.*'

**Local Funeral Directors:** Funeral Link have been developing relationships with local Funeral Directors, having attempted to make contact with all companies operating in Dundee. Funeral Link have had follow-up meetings with Affertons Funeral Care, James Ashton & Son, Sturrock, Comb and Davidson Family Funeral Directors, Miller Family Funeral Directors, and Robert Samson Funeral Directors, and some 'behind the scenes' viewings with some of the Funeral Directors, to get a deeper understanding of the progression through the whole funeral process. Funeral Link have made links with companies which operate at regional and national levels, holding an information-sharing session with Dignity, including a

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<sup>28</sup> <https://www.facebook.com/funeralinkdundee/videos/1035848943281327/>

tour of the Crematorium and a local funeral directors, and having an information-sharing session with Caledonia Cremations. Funeral Link also now have contact with Coop Funeralcare, meaning they have links with all of the organisations operating within the Dundee market.

Through developing good relationships with local Funeral Directors and gaining an understanding of the industry, Funeral Link are able to demonstrate the range choices available and explain to their clients the potential to 'shop around' and find out what is available from different providers. **There has been a real willingness on the part of the Funeral Directors to work with Funeral Link to help the people who are least able to afford a funeral.**

One local Funeral Director said, *"Funeral Link have only been established for a few months but their potential to make a difference in many areas has become clear. This is in no small part to the drive and enthusiasm of [the team], who are very approachable and keen to learn about all aspects the funeral industry.*

*Funeral Link are one of very few organisations that appear to understand the difficulties our profession is facing, and who actually want to work with funeral directors, to find solutions as they arise. It is vital that a sustainable solution is found to enable our profession to continue to offer the level of service we do.*

*It is encouraging that there are organisations that recognise the need to engage with funeral directors, in a meaningful, realistic and practical way."*

**It is evident within Dundee that the focus on Funeral Directors' prices has led to sharp reductions in the advertised price offering in the local market, and improvements in clarity and transparency available online.**

**Respectful Funeral Service:** Funeral Link are able to use the Respectful Funeral Service as an option to tell clients about when advice is sought on funeral costs. Funeral Link promoted the service when it was launched, through their Facebook page, with a 'pinned' post which was 'boosted' through paid advertising. By 25<sup>th</sup> April 2019, 4,291 people had seen the post (2,203 'organically' and 2,088 through advertising). The post was shared 24 times by a mixture of local community groups, individuals, national organisations, Councillors, and businesses. The Respectful Funeral Service may still prove to be too expensive for those on the lowest incomes; Funeral Link can help to identify alternative routes to consider in these circumstances.

**Credit Union:** Funeral Link are aware of the role of credit unions as an option for borrowing funds to help pay for funerals or deposits. The Funeral Link service was promoted by Discovery Credit Union in their newsletter in Spring 2019 (see picture right) as part of a wider article to promote the need to save for a funeral. Funeral Link can show a credit union as an option for sourcing funding for a funeral as part of a suite of options for clients. Whilst they can had out a list of local credit unions, it must be left for the client to choose and make further inquiries themselves when deciding which credit union might be suitable for them.





**Dundee Pensioners' Forum (DPF):** Funeral Link have good links with Dundee Pensioners' Forum. DPF members sit on the Dundee Funeral Poverty Action Group, the Funeral Link Steering Group, and Funeral Link Board. They have also helped to promote Funeral Link when speaking at the National Union of Journalists Annual General Meeting in Dundee in March 2019 and in their Spring 2019 newsletter and Funeral Link have attended DPF meetings to promote the service and understand needs.

**National-Level Relationships:** On a national scale, the manager has networked, for example, at Glasgow Film Festival, meeting representatives of Pushing Up The Daisies, Caledonian Cremations, Final Fling, and the producer of the film 'Dead Good'. The organisation has a national profile through meetings with the national organisations including Dignity and Caledonia Cremations, as well as joining the 'Good Life, Good Death, Good Grief' network of organisations and attending their 'Good Death' week Holyrood networking event on 15<sup>th</sup> May, 2019. Funeral Link were also granted membership of the Scottish Government Working Group on Funeral Poverty and have held a meeting with the Scottish Government Inspector of Funeral Directors.

The table below summarises the links Funeral Link has within Dundee and the wider area, showing the breadth of its reach.

<b>PARTNER</b>	<b>ROLE</b>
Dundee City Council	Steering Group member, benefit in kind agreed to use their community centres for free to meet clients in their own community, financial support via the Common Good Fund; Participate in financial inclusion strategy group.
Faith in Community	Steering Group member, leader of Dundee Funeral Poverty Action Group, Link to the local faith communities, agreement to run joint events e.g. consultation event in Oct/Nov.
Scottish Government	Current Funder; Provided feedback on key areas of policy development, including constructive commentary on the forthcoming Funeral Support Payment following individualised consultation; Met with Inspector of Funeral Directors to understand future plans around regulation; Meeting planned with Aileen Campbell, Cabinet Secretary for Communities and Local Government.
Social Security Scotland	Collaboration on planned launch of Funeral Support Payment process and application documentation. Collective place based approach agreed going forward.
Dundee Social Enterprise	Steering Group member. Offer support around social enterprise development.
Dundee Pensioners Forum	Steering Group member, strong partnership working, well respected campaigning role within the local community to continue to facilitate

	change in relation to funeral poverty. Agreement reached to work together on a funeral information roadshow for local pensioners in 2019/20.
Discovery Credit Union	Steering Group member, currently working on a Funeral Product which will assist with deposits, subject to eligibility.
Dundee Funeral Poverty Action Group	Well established partnership to challenge high costs of local funerals, already seeking a restricted pot of funding on behalf of Funeral Link to assist with funeral poverty for clients.
University of Dundee	Academic partner in current funded period and in stage 1 SIF funding.
Roxburghe House Hospice	Referrer to support service, staff awareness session, posters, leaflets.
Ninewells Hospital Advice Centre	Agreement reached to base ourselves in their centre one morning/afternoon per week from July 2019.
NHS Bereavement Services	Referrer to support service, placing Funeral Link leaflets in all the packs provided to families whose loved one dies in hospital.
Dundee City Council Registrars	Referrer to support service, placing Funeral Link leaflets in all the packs provided to families who register the death of their loved one at the registrar, benefit in kind agreed to use their meeting room for free to meet clients in the city centre as required.
Victim Support	Referrer to support service, offering Funeral Link leaflets as needed to their clients.
Funeral Directors	Working collaboratively around deposits and charges with Funeral Directors for Funeral Link clients.
Caledonia Cremation	Partnership working has saved money for a family who wished to have a direct cremation for their loved one. Foundations in place for a strong collaborative partnership going forward.
Brooksbank (Money Advice)	Currently working out of same office base, opportunity for clients to only have one visit to access both services as required. Will currently receive referrals from Funeral Link for benefits check and debt advice as well as appeals.
Dundee CAB (Money Advice)	Will be in Ninewells hospital advice centre the same day as us from July so opportunities to explore further mutual work. Currently receive referrals from Funeral Link for benefits check and debt advice as well as appeals along with all other generic CAB services.
Connect (Money Advice)	Funeral Link have met the local Connect Money Advice team who are willing to assist clients with money advice at their various locations across the city.

Dundee Money Action (Money Advice)	Currently working out of same office base, opportunity for clients to only have one visit to access both services as required.
Boomerang Bereavement Cafe	Established strong base for partnership working. Already can refer or buddy someone to their Café Connect (bereavement café), held the first 'forget-me-not lunch' evaluation event in their place. Strong potential for future partnership working.
Cruse Scotland	Already established strong basis for partnership working, Funeral Link will work with Cruse Scotland to use mutual strengths to the benefit of the bereaved in Dundee.
Barnardos Rollercoaster Project	Already referred one young person to their bereavement support service. Anticipate further partnership work going forward.
Good Grief Trust	Added Funeral Link service to their map. Ability to signpost clients and agencies to help/services depending on need.
GP Listening Services	Support staff trained in listening by this team and have strong connections with this valuable service throughout Dundee GPs with the ability to suggest individuals self refer if needed.
Social Prescribing Team	One of the Funeral Link Trustees is part of the Social Prescribing team. Already carried out an awareness session with this team and had referrals directly from this team.
Dundee Voluntary Action (DVA)	Strong links established with DVA. Presented at their event with Age Scotland. Identified potential opportunities to work together to benefit older people.
Age Scotland	Presented at their event in Dundee in April, working collaboratively with them going forward.
Sheltered Housing	Have already presented at a Sheltered Housing community group meeting and intend to reach more groups as part of this project.
Positive Steps	Partnering with Funeral Link providing payroll services.
Scottish Living Wage	Signed up to the Scottish Living Wage in line with local and national priorities. Dundee has recently been announced as the first living wage city.
Churches (40+)	Around 20+ attended information session at local community centre and have shared with their congregations. Information has also been shared via local Bishop, Kirk Session and other means with assistance from Faith in Communities.
Clothes Banks	All three local Clothes Banks have already helped 3 clients to date, via referral from Funeral Link, offering suitable clothes for their loved one's funerals.



Local crisis food support	Funeral Link has attended many of the local crisis food support in order to get to know what is happening in the locality, raise awareness of Funeral Link's work and also to gain trust from those operating these services to refer clients to them.
Alcohol and Drugs charities	Have started the conversation and working to create collaborative partnerships to assist recovery pathways.
Salvation Army	Already worked with Salvation Army to assist one of their clients to arrange a funeral. Strong partnership and trust has been gained from this work.
Community Groups	Working with community groups to raise awareness and co-host information / myth buster sessions around funeral costs, wills, power of attorney etc.
Civil and Humanist Celebrants	Met with 16 local celebrants who regularly conduct funerals and have agreement from some of these to offer their support for free or at a reduced price should clients need their help.
GP Surgeries	All GP surgeries have received visits from Funeral Link and leaflets and posters placed.
SSAFA	Shared work at their AGM and aware of how can work together to help clients. Potential for referrals to and from SSAFA.
Scottish Working Group on Funeral Poverty	Manager is a group member and will attend meetings to contribute, collaborate and share good practice from Funeral Link work.
Good Life, Good Death, Good Grief network	Joined in April 2019 to assist with their mission to make Scotland a place where there is more openness around death, dying and bereavement. Mutual social media information sharing, awareness and networking. Applied to be part of their Truacanta project.

### 5.10 Longitudinal Study

There is potential for further study to be carried out should Funeral Link obtain funding to extend its lifetime. Impacts – in particular in terms of mental health and well-being effects – on Funeral Link clients could be tracked over a number of months, to assess whether and to what extent the advisory service has impacted on the ability to organise a lower-cost funeral, not go into debt as a result of this advice, and how this may have allowed them mental space to grieve for their loss.

Funeral Link have identified that in future work, they would like to re-visit clients to ensure their support in the longer-term. This could be through 'Thinking of You' cards a year after support was given, with an invitation to re-engage with the team if support is needed and details of support organisations on the back of the card. Grief lasts longer than the initial few weeks, and support can be required in the longer-term. They have already begun to hold such events, for example as part of 'Death Week' in May 2019, Funeral Link held a 'forget-me-not' lunch with Boomerang, inviting clients who have been supported, as

well as people from support groups. It is anticipated that such events could be held in the future, and Funeral Link staff would give former clients the opportunity to talk, at which point clients may identify they require further support. Equally, clients may choose to become volunteers or even run cafés in future years.

## Chapter 6: Conclusions and Recommendations

### 6.1 Funeral Link Clients

#### The Four Funeral Link Client Groups

Funeral Link has provided a widely recognised valuable service within the City of Dundee during its initial phase of establishment. Across the city advice agencies welcome its establishment serving specific and specialist needs within the community that cannot easily be provided by existing agencies.

The research into funeral poverty in Dundee has identified that there are distinct segmented populations within Funeral Link's client groups each requiring distinct interventions. These are:

1. a) Deceased without a next of kin and next of kin with insufficient resources to provide for the legal requirements of disposal of a deceased. This population have only the recourse of an environmental burial provided by Dundee City Council and distinct measures to provide a respectful burial are required.  
b) Deceased with a next of kin who believes they have insufficient funds for the legal requirements of disposal of a deceased. This population is a key client group for Funeral Link as they are able to assist through setting out lower-cost options that could be available to these families. This could involve a reduced choice but the family may find this preferable to an environmental funeral. Funeral Link's role also involves helping the family raise deposits, helping with Social Fund applications, liaising with funeral directors, signposting, referring and guiding clients to agencies, charities and external organisations capable of providing grants and low cost loans.
2. Next of kin on benefits that provide entitlement to a successful Social Fund Funeral Expenses Payment (SF200) application. This population is partly catered for by existing Funeral Directors who, in some cases, complete SF200 applications for clients. Funeral Link's role here is in resolving difficulties next of kin face in raising deposits and ensuring debt arising from additional funeral costs, not covered by the SF200 application, can be funded.
3. Next of kin on low household incomes without recourse to Social Fund applications. This should be the main target group for Funeral Link's activity. This population are least well served by the existing funeral directors in the market but stigma and social norms prevents next of kin making use of environmental burials. Funeral Link's role with this client group is much more extensive in identifying measures to reduce costs while retaining the need for a respectful funeral, signposting, referring and guiding clients to agencies, charities and external organisations capable of providing grants and low cost loans and negotiating with funeral directors for discounted prices for traditional services.
4. Next of kin with sufficient resources to be able to provide for their desired funeral. Funeral Link's services with this client group is one of limited advice and signposting for existing services.

### Funeral Link Actions to Help Clients by Group

Funeral Link has clear areas of action which are set out with respect to the four client groups in the table below. These are set out alongside some other policies which would help clients in each of the groups.

	Group	Financing	Actions	Agency
1a	No Next of Kin/ Next of Kin have insufficient funds	No funds available to pay privately	Environmental funeral A	Dundee City Council
1b	Next of Kin believe they have insufficient funds	Funeral to be paid, may involve compromise but family find that preferable to an environmental funeral	B, C, D, E, F, G, H, I	Funeral Link, funeral directors, Citizens Advice Bureau Dundee, Brooksbank, Connect, Cruse Scotland, NHS, substance misuse charities, clothing charities, credit unions
2	Next of Kin who receive Social Fund payments	Cost of cremations covered. Cost of burial partially covered (not include perpetuity payments in Dundee). Additional costs payment of £700. Can still experience shortfalls for even basic funerals, deposits generally required	Change payments to include full burial costs in Dundee when payments change to Scottish Government administration of Funeral Expenses Assistance Credit unions able to offer shortfall funding of up to £800 Incentivised savings schemes to help cover costs in advance. B, C, D, E, F, G, H, I	Scottish Government Credit unions Credit Unions, Scottish Government Funeral Link, funeral directors, Citizens Advice Bureau Dundee, Brooksbank, Connect, Cruse Scotland, NHS, substance misuse charities, clothing charities, credit unions
3	Next of Kin with low household income and no Social Fund payments	No benefits support for costs; deposits also generally required.	Incentivised savings schemes to help cover costs in advance. Credit Unions able to provide shortfall funding of up to £800 B, C, E, F, G, H, I	Credit unions, Scottish Government Credit unions Funeral Link, funeral directors, Citizens Advice Bureau Dundee, Brooksbank, Connect, Cruse Scotland, NHS, substance misuse charities, clothing charities, credit unions
4	Next of Kin with sufficient resources	Able to provide for the desired funeral	G, H	Funeral Link

- 'At need' actions by Funeral Link:
  - A. **Referring clients to Dundee City Council** and assistance with improvements for a respectful burial for those needing an 'environmental' or 'national assistance' funeral (*Funeral Link working with Dundee City Council*).
  - B. **Giving advice to clients on reducing costs** to the consumer by advising on how to adapt funerals at the 'at need' point (*Funeral Link working with funeral directors*).
  - C. **Negotiating and advocacy** – working with funeral directors to obtain lower cost funerals for clients that most need help (*Funeral Link working with funeral directors*).
  - D. **Assisting clients with Social Fund applications** providing expertise to achieve success (*Funeral Link working with funeral directors*).
  - E. **Referring clients to partner agencies who can help with grant funding** and other expertise (*Funeral Link working with Citizens Advice Bureau Dundee, Brooks Bank, Connect etc*).
  - F. **Referring clients to partner agencies who can help with wider support** such as clothing, counselling, substance abuse, debt advice etc (*Funeral Link with Cruse Scotland, NHS, substance misuse charities, clothing charities etc*).
- Funeral planning education by Funeral Link:
  - G. **Advice on reducing costs** by discussions and communication about funeral planning prior to the time of 'at need' through marketing and community events (*Funeral Link*).
  - H. **Advice on administration** prior to 'at need point through will-writing, Power of Attorney and funeral planning (*Funeral Link*).
  - I. **Education and signposting to incentivised savings schemes** to help cover costs in advance (*Funeral Link with credit unions*).

## 6.2 Funeral Link's Role within the Wider Funeral Sector

The recently published Scottish Government Guidance on Funeral Costs sets out recommendations for burial authorities, cremation authorities and funeral directors. These recommendations are fully supported and this section sets out how Funeral Link can help to support the implementation of these within Dundee.

### Funeral Directors' Pricing and Quality

There is a clear confusion around both pricing and quality standards of funeral directors, and links between the two.

**Quality Standards:** In order to improve understanding of quality, it is anticipated the Inspector of Funerals will produce recommendations about quality standards and licensing through the Scottish Government Code of Practice for Funeral Directors. Clarification of the standards employed by a funeral director with better signalling to consumers will assist consumers in making an informed choice to find a funeral director which fits with their requirements, preference and budget.

Through better transparency of quality standards and close work with the funeral directors, Funeral Link will be able to understand the services of the different funeral directors to be able to provide transparent options and choices for their clients. This will allow Funeral Link clients to identify companies with a good fit of preferences for their next-of-kin.

**Education and Signalling Quality:** There is a mismatch between people wanting good standards of care for the deceased, but being relatively uninformed of the processes involved. It is difficult for funeral directors to demonstrate directly their skills and qualities to ensure public understanding of their expertise and what is required for good quality care of the deceased as much of this is (perhaps necessarily) conducted behind closed doors when physically dealing with a deceased person. To help improve public understanding, funeral directors may consider 'opening up' their facilities to aid understanding for those in the public who would like to be provided with more information. This could be in the format of formal tours as part of a 'Doors Open Day'<sup>29</sup> in Dundee or 'Good Death Week'<sup>30</sup>. Whilst sensitivity would be required, interested members of the public could attend and information about quality and standards would be disseminated through word of mouth. Funeral Link could liaise with funeral directors to bring such events forward by marketing to interested groups.

**Online Pricing:** In line with Scottish Government recommendations, there is clearly scope for clearer and more itemised prices to be more readily available – particularly online – to aid public understanding of what reasonable costs can be expected from a funeral, and to what quality and standards these prices relate. This would also help standardise pricing between online advertised prices and what is quoted in the funeral directors' office. Cooling-off periods should be considered as an option, once an itemised price estimate has been given as a better protection for consumers who may make decisions about a funeral when in a vulnerable position. With the increased provision of online or more transparent pricing, Funeral Link provide more informed choices to their clients about potential costs of different funeral directors, to find a service which best suits the needs of the client in terms of price alongside other areas of concern, such as location of the funeral director, and specific services.

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<sup>29</sup> <http://www.doorsopendays.org.uk/>

<sup>30</sup> [https://www.goodlifedeathgrief.org.uk/content/good\\_death\\_week\\_2019/](https://www.goodlifedeathgrief.org.uk/content/good_death_week_2019/)

**Transparency:** The Scottish Government have published a glossary of terms to aid public understanding of the funeral sector and terms that may be confusing if heard for the first time<sup>31</sup>. This resource is a useful document that Funeral Link use to help bring clarity for their clients when organising a funeral.

**Respectful Funeral Services:** Whilst the Respectful Funeral Services in Dundee currently provide an option for consumers who are looking for a set of requirements within a funeral and a 'fixed price' for these services, Chapter 3 clearly shows there may still be a significant shortfall in funding for many people, even if they receive funding from the Social Fund. Funeral Link helps people who cannot afford the Respectful Funeral Service package through signposting to lower cost funeral options – by making lower-cost funeral choices and/or through liaison between funeral directors and the next of kin.

### Crematoria

**Choice of pricing:** A variety of cremation prices should be offered to give choice to those who need a timeslot during the day (e.g. for mourners who need to travel), but are unable to afford the premium higher prices charged for a long slot in Dundee. Funeral Link are able to highlight the availability of different priced options, suggesting use of the earlier timeslots for their clients, or highlighting different options such as indirect cremation packages available through different providers, such as Caledonia Cremations and others.

**Additional crematorium facility:** To improve choice for the consumer, Dundee City Council could actively consider the addition of another cremation facility. The CMA report suggests that there are low numbers of crematoria in any given area because only a small number may profitably operate given the fixed demand in a local market. It suggests 800 - 1,000 cremations per year are required to be viable. Given there are approximately 1,800 deaths in Dundee per annum, if the surrounding areas were included, there could be potential for an additional crematorium capacity. This would require Dundee City Council to consider more fully the 'need', liaise within Departments such as the Planning Dept. to assess potential applications, and potentially consider involving itself actively within a development. Funeral Link can liaise with the Council and Dundee Funeral Poverty Action Group to help provide advice on additional facilities.

## 6.3 Funeral Link's Role with the Local Authority

### Burial Plots

The high and rising price of a Local Authority burial plot and related costs have been raised frequently in discussions with stakeholders and individuals in Dundee, and amount to an estimated 45% of the cost of a low-cost burial funeral. To aid partnership approaches and improve public understanding, it would be helpful for Dundee City Council to provide transparency on their costs as well as their pricing, as suggested in the Funeral Costs Plan (Scottish Government, 2017: 12)<sup>32</sup> and Guidance on Funeral Costs (Scottish Government, 2019b: 9). Funeral Link can help public understanding of these prices once they are available and understood.

### Education and Outreach Activities

**Lifelong Education:** The public sector could offer support for third sector organisations, charities and public sector national organisations which promote discussions around death and encourage people to

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<sup>31</sup> <https://www.gov.scot/publications/funeral-payment-and-funeral-poverty-glossary-of-terms/>

<sup>32</sup> 'In addition to publishing charging information, the Scottish Government supports improving the availability of information on costs incurred by local authorities in relation to cemeteries and crematoria, including presenting this in a more consistent manner across local authorities.' (Funeral Costs Plan, Scottish Government, 2017: 11)

think ahead through activities such as bereavement cafés, conferences and public meetings. Support could be in the form of tours or sponsorship for Good Death Week. Funeral Link also have a potential role to play in this educational area, with plans for running their own bereavement cafés and community events and their role in assisting people to think in advance about other aspects such as Will-writing, Power of Attorney and funeral planning.

**School Education:** More research into the benefits of introducing the subject of death and preparations at secondary school level would be helpful, potentially through charities going in to schools with trained professionals to carry out workshops.

## 6.4 Funeral Link's Role with the Scottish Government

### Government Support – Funeral Support Payment and the Incentivised Funeral Savings Scheme (IFF)

The changes being introduced by the Scottish Government look to be positive in terms of providing financial support to those who need it, and simplifying and speeding up what is currently an often prohibitively overly-complicated process.

However, there will still be some in society who struggle with funeral payments, such as people who do not receive a qualifying benefit for government support, but do not have spare capacity in their income for a funeral. In these circumstances, the introduction of the Scottish Government bond would provide an incentivised way to save in advance, potentially through very small amounts being saved over a long period of time, and potentially in conjunction with credit unions. This would require promotion and education alongside the bond's introduction to raise awareness of the need to save for a funeral. More research needs to be carried out here, and liaison with Scottish Government over their proposals. Again, Funeral Link have a useful information dissemination role for such a bond, including discussion around this in community events they carry out, and making clients aware of this as an option when discussing funeral planning.

## 6.5 Funeral Link's Role within the local Third Sector

Funeral Link has established excellent links with other local third sector organisations, community groups and support agencies. It should continue to work with these organisations, whilst also working with new entrants with whom they could promote the service of Funeral Link. Funeral Link should continue to conduct outreach meetings in the community. It should also seek to deepen relationships with some of the organisations through framework agreements to formalised referral relationships.

Funeral Link should continue to investigate ways to signpost clients on to other support agencies for specific and expert follow-on support, such as counselling and membership of mutual-support groups e.g. Boomerang Café Connect.

## 6.6 Conclusions

Funeral Link clearly has a vital and unique role in assisting next of kin organising a funeral within Dundee. Where market failure exists in the market, Funeral Link help clients, for example, by providing information about costs and options, to ensure customers have a choice. They play an important advocacy role, and also an essential support role to the bereaved, who in many cases feel they have nowhere else to turn. The financial impacts of Funeral Link's work are beginning to be felt, to the benefit of many of the most deprived individuals, and the positive impacts on clients' health and well-being are set out in some of the



case studies. The richness of Funeral Link's work can be felt through comments made in the case studies, where clients would have felt 'lost' without Funeral Links support. It is clear that there is no organisation playing a similar role to Funeral Link in Dundee, and that its impacts are being felt by individuals in some of Dundee's most deprived locations.

Funeral have succeeded in working with yet also challenging the funeral sector in Dundee to address high costs of funerals. That they have succeeded in overcoming what was a potentially confrontational framework and turning it into a collaborative arrangement is indicative of both the need for Funeral Link and its success to date.

Further work to be carried out by Funeral Link includes more of an educational role, in which there will be marketing activities for people to be advised at an earlier stage to carry out pre-death anticipatory activities, such as will writing, and agreeing Power of Attorney, as well as thinking about savings schemes for a funeral. Combined with the activities being carried out in the market around pricing and transparency, as well as increased choice in the market for a range of funeral options, Funeral Link's education work will feed into individuals and society being more prepared in advance for a funeral, meaning there will be less 'at need' help required, and ultimately lower levels of funeral debt within the City.

## Appendix 1 – Stakeholder Consultation by Dundee University

David Baxter	Dignity, Dundee Crematorium
John Birrell	Bereavement Consultant
Gerry Boyle	Dignity
Julie Bruce	Discovery Credit Union
Andrew Burke	Scottish Government
Lucy Carmichael	Scottish Government
Alan Cowan	Discovery Credit Union
Simon Cox	Dignity
Jacky Close	Faith in Community
Kate Davidson	Dignity
Jim Elder	Dundee Pensioners' Forum
Steve Gant	Dignity
Alan Gibbon	NHS
Margaret Harper	NHS
Ian Kirk	Caledonian Cremations
Erik Cramb	Dundee Pensioners' Forum
Patrick McGlinchey	Golden Charter
Susan McGregor	Roxburghe House
Vivienne McGuire	CAHID
Natalie McKail	Inspector for Funeral Directors
Mary Kinninmonth	Board Chair
Tracy McNully	Dundee Citizens Advice Bureau
Ruth Mendel	Citizens Advice Scotland
Derek Miller	Dundee City Council
John Pratt	Dundee City Council
Joseph Ritchie	Scottish Government
David Robertson	Stirling Citizens' Advice Bureau

Elaine Schendel

East Ayrshire Council

Debbie Silver

Scottish Government

Gordon Swan

Golden Charter

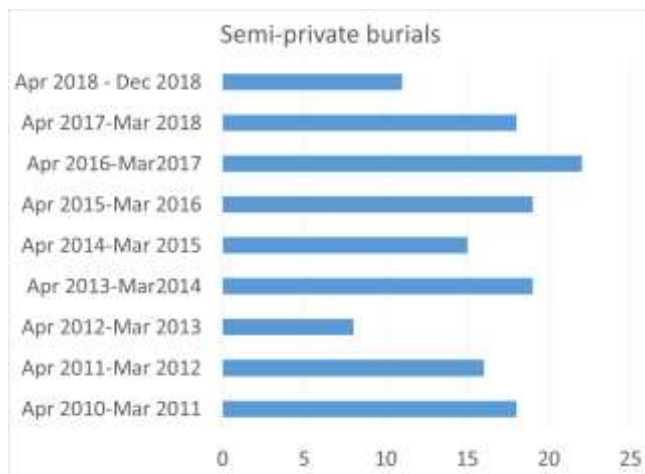
Chris Warner

Competition and Markets Authority

We have also grateful to the selection of local Funeral Directors who agreed to meet with us. Their names have been withheld for reasons of commercial sensitivity.

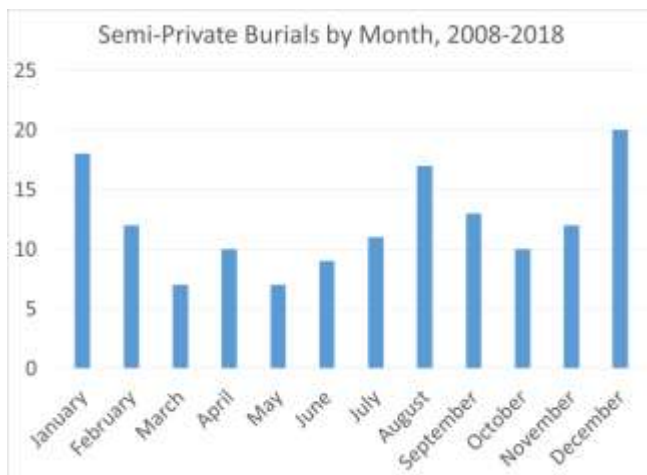
## Appendix 2: Local Authority Funerals

- Dundee City has had an average of 18 Local Authority funerals over the last 8 full financial years.
- The lowest number in any year has been 8 funerals.
- The highest number in any year has been 22 funerals.
- The funerals have comprised 75% males and 25% females.
- 79% of the deceased had next-of-kin, whilst 21% had no next of kin.
- The largest number of burials occur in December and January, followed by August.
- The mean age of death was much lower for those who had Local Authority funerals, at 61.9 years, compared to 73.6 years for Dundee as a whole.
- Dundee is estimated to have spent £7,899 on environmental funerals in 2017 (Stirling CAB, 2018: 29) and £9,747 in 2016. This is an estimated £438.83 per funeral in 2017.

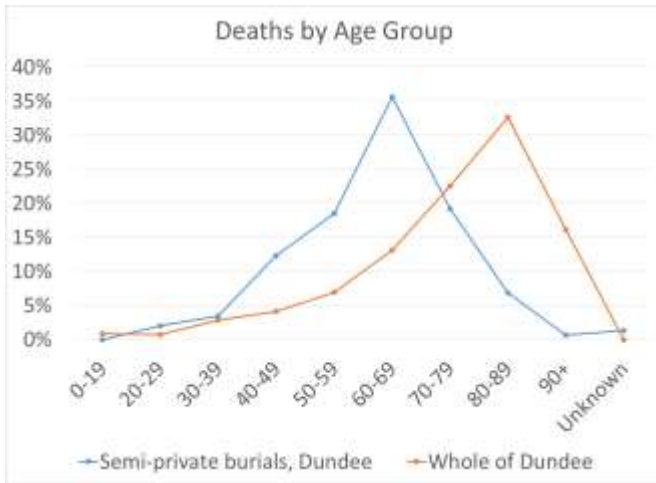


Source: Dundee City Council

Note: 2018 financial year data April-December 2018 only.



Source: Dundee City Council



Source: Dundee City Council

**Table 28. Local Authority Provision in Regards to National Assistance Funerals (YELLOW = Yes, WHITE = No, BLACK = N/A)**

	Ministers/ celebrant fee	Viewing of the body	Coffin	Flowers	Hearse	Additional Car(s)	Paper Notice	Headstone	Own grave	Communal grave (unless they have their own lair)	Ashes returned to relatives (if applicable)	Aftercare support for relatives	Support in application to DWP
Aberdeen City													
Aberdeenshire													
Angus													
Argyll and Bute													
City of Edinburgh													
Clackmannanshire													
Western Isles													
Dumfries & Galloway													
Dundee City													
East Ayrshire													
East Dunbartonshire													
East Lothian													
East Renfrewshire													
Falkirk													
Fife													
Glasgow City													
Highland													
Inverclyde													
Midlothian													
Moray													
North Ayrshire													
North Lanarkshire													
Orkney Islands													
Perth and Kinross													
Renfrewshire													
Scottish Borders													
Shetland Islands													
South Ayrshire													
South Lanarkshire													
Stirling													
West Dunbartonshire													
West Lothian													
<b>Total</b>	<b>16</b>	<b>15</b>	<b>27</b>	<b>5</b>	<b>26</b>	<b>2</b>	<b>9</b>	<b>4</b>	<b>16</b>	<b>19</b>	<b>20</b>	<b>7</b>	<b>15</b>
%	50%	47%	84%	16%	81%	6%	28%	13%	50%	59%	83%	22%	47%

Source: Stirling District Citizens Advice Bureau, 2018

## Appendix 3: Policies in Scotland

- **March 2015:** removal of £170 doctor's fee from cremation charges, resulting in parity between burial and cremation, and reducing the cost for members of the public choosing a cremation;
- **October 2015:** Scottish Government commissioned John Birrell and Citizens Advice Scotland to prepare a report on Funeral Poverty in Scotland;
- **February 2016:** Funeral Poverty in Scotland, a Review for Scottish Government<sup>33</sup> was published alongside the Scottish Government's response;
- **March 2016:** Funeral Expense Assistance and Funeral Poverty Reference Group established to support policy development of the benefit that will replace the current DWP Funeral Payment<sup>34</sup>;
- **April 2016:** Burial & Cremation (Scotland) Act 2016<sup>35</sup> received Royal Assent. This Act includes powers for the Scottish Government to issue guidance on funeral costs. It also requires local authority burial and cremation authorities to publish information on charges. These measures will improve transparency of pricing and help members of the public to more easily access charging information in advance of arranging a funeral;
- **July – October 2016:** Consultation on the Social Security Bill<sup>36</sup>, including the Funeral Expense Assistance benefit;
- **October 2016:** Fairer Scotland Action Plan<sup>37</sup> published. This outlines 50 actions to help tackle poverty, reduce inequality and build a fairer and more inclusive Scotland, including an action on tackling funeral poverty;
- **Autumn 2016:** Three round table discussions on funeral poverty hosted by the Cabinet Secretary for Communities, Social Security and Equalities with the funeral industry, local authorities, advice services and other third sector organisations;
- **November 2016:** National Conference on Funeral Poverty held to look at issues related to funeral poverty, build consensus and consider potential solutions;
- **April 2017:** Scottish Government funded e-learning course launched by Citizens Advice Scotland for advisors on the current DWP Funeral Payment;
- **April 2017:** Appointment of the first Inspector of Funeral Directors. The Inspector will spend the first 18 months of their two-year appointment undertaking a review of the funeral profession, with a view to making recommendations to Scottish Ministers on how it should be regulated, including whether to introduce a licensing regime;
- **June 2017:** Social Security Bill introduced to the Scottish Parliament; and
- **August 2017:** Publication of Funeral Costs Plan.' (Scottish Government, 2017, p.8).

The next section sets out progress since publication of the 'Funeral Costs Plan'.

- **August 2017:** The Scottish Government's 'Funeral Costs Plan' was published. This sets out 10 actions for the Scottish Government to take in addressing funeral poverty and improving the availability of more affordable funeral options.

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<sup>33</sup> <https://www.cas.org.uk/publications/funeral-poverty>

<sup>34</sup> <https://www.gov.scot/groups/funeral-poverty-and-funeral-expense-assistance-reference-group/>

<sup>35</sup> [http://www.legislation.gov.uk/asp/2016/20/pdfs/asp\\_20160020\\_en.pdf](http://www.legislation.gov.uk/asp/2016/20/pdfs/asp_20160020_en.pdf)

<sup>36</sup> <https://consult.gov.scot/social-security/social-security-in-scotland/>

<sup>37</sup> <https://www.gov.scot/publications/fairer-scotland-action-plan/>

- **September 2017:** The Scottish Government published guidance to help people planning their own funeral, including about planning how to pay for it<sup>38</sup>.
- **May to August 2018:** The Scottish Government ran a consultation on Funeral Expense Assistance Regulations. ‘Funeral Expense Assistance (Scotland) Regulations 2019’ were published in January 2019 (<https://www.gov.scot/publications/scottish-government-response-consultation-funeral-expense-assistance-scotland-regulations-2019/pages/1/>). This sets out that the Funeral Expense Assistance benefit will replace the Social Fund Funeral Expenses Payment in Scotland, by the summer of 2019. The Government aims to process applications within 10 days (rather than 15) (<https://www.gov.scot/policies/social-security/funeral-expense-assistance/>). Payments will increase in line with inflation annually and the Government will widen the scope of who can receive payments and they estimate this will increase eligibility by around 40% (<https://www.gov.scot/news/funeral-expense-assistance/>). However, the initial value of the payment to an individual will not increase compared to the current payment, and will remain as help towards the cost of burial or cremation and certain transport costs, plus £700 for other costs such as funeral directors’ fees and a coffin.
- **August to November 2018:** The Scottish Government ran a consultation on Funeral Costs (<https://consult.gov.scot/social-security/statutory-guidance-on-funeral-costs/>). This sets out 8 themes:
  - Use of language and terminology
  - Display of pricing information
  - Transparency of cremation charges
  - Definition of a simple funeral
  - Transparency of pricing at point of sale
  - Burial or cremation without using the services of a funeral director
  - Understanding local authority charges
  - Local authority measures to reduce funeral poverty
- **May 2019:** Guidance on Funeral Costs was published <https://news.gov.scot/news/funeral-cost-guidance-published>. This sets out guidance for burial authorities, cremation authorities and funeral directors and additional information for local authorities with respect to charges.

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<sup>38</sup> <https://www.gov.scot/publications/planning-funeral/pages/4/>



## Appendix 4: Social Fund Data

In 2017-18 in the UK, around 40,800 Funeral Expenses Payment claims were made, and 25,500 awards were made (63%), amounting to £37.1 million. The average payment was £1,461. Stirling Citizens Advice Bureau ('UNMARKED: Funeral Poverty and National Assistance Funerals in Scotland 2017/18, p. 19) suggest 'Of those refused, 25% was due to the applicant not being deemed responsible for the arrangement of the funeral due to there being other family members who are either closer related or are not in receipt of a qualifying benefit.' It also suggests that the average payment amount has increased by 3.9% between 2013 and 2018 – below the rate of increase in the cost of a 'basic' funeral and also the rate of increase of median wages.

According to Stirling CAB, Scotland received 30,200 applications between 2013/14 and 2017/18, with 65% awarded (38% initially refused), an average payment of £1,351 (below the UK average payment of £1,401) but above the average award rate of 60%. Scotland has received a total £205,058,000 over the time period. Stirling CAB estimate the average DWP Funeral Payment in 2018 of £1,366 left a shortfall of £2,719 compared to the average cost of a basic funeral.

Claimant Group	Awards ('000s), UK	% of Total Awards
Pensioners	7.8	30.7
Unemployed	2.5	9.9
Disabled	2.2	8.5
Lone Parents	0.5	2.1
Employed	-	-
Others	12.4	48.5
Total	25.5	100.0

Source: Annual Report for the Secretary of State for Work and Pensions on the Social Fund 2017-2018, Annex 2a

25% of appeals for the Funeral Expenses Payment resulted in the appellant's favour (based on number heard and decided at Hearing).

	Social Fund Appeals Dealt with at the First Tier Tribunal April 2016-March 2017
Number of Receipts	305
Number of Disposals	323
Number Decided without a Hearing	69
Number Heard and Decided at Hearing	254
Number Decided in Appellant's Favour	64
Percentage Decided in Appellant's Favour	25%

Source: Annual Report for the Secretary of State for Work and Pensions on the Social Fund 2017-2018, Annex 9

## Appendix 5: Media Coverage

The Conversation, 5<sup>th</sup> February 2019 'Funeral costs are driving grieving families into poverty but at last a fightback has begun' available at <https://theconversation.com/funeral-costs-are-driving-grieving-families-into-poverty-but-at-last-a-fightback-has-begun-110919>

The Courier, 14<sup>th</sup> February 2019 'Funeral costs rise leaving families struggling to pay rent or even grieve' available at <https://www.thecourier.co.uk/fp/news/local/dundee/826734/funeral-costs-rise-leaving-families-struggling-to-cover-price>

Dundee Evening Telegraph, 16<sup>th</sup> February 2019 'New Dundee charity aims to help people who can't afford to pay for funerals' available at <https://www.eveningtelegraph.co.uk/fp/new-dundee-charity-aims-to-help-people-who-cant-afford-to-pay-for-funerals/>

Dundee Evening Telegraph, 20<sup>th</sup> February 2019 'Grieving Dundee families being plunged into rent arrears due to funeral costs' available at <https://www.eveningtelegraph.co.uk/fp/grieving-dundee-families-being-plunged-into-rent-arrears-due-to-funeral-costs/>

The Scotsman, 20<sup>th</sup> February 2019 'Funeral Cost Fightback has Begun'

Dundee Evening Telegraph, 27<sup>th</sup> March 2019 'Homeless Andy thanks Dundee public as he tries to raise funds for wife's funeral' available at <https://www.eveningtelegraph.co.uk/fp/video-homeless-andy-thanks-dundee-public-as-he-tries-to-raise-funds-for-wifes-funeral/>

## Appendix 6 Rationale for Changing Measures of Success

### **1) Funerals undertaken with help from social enterprise within the target population of at least 400 families who suffer bereavement within the SIMD 40 areas of Dundee during the project period**

This measure has been reduced to reflect the shorter timescale of the project.

### **2) Individual advice to families within the SIMD 40 areas of Dundee who enquire about all things related to funerals during the project period**

The initial measure of success was felt to be too similar to outcome 1. The manager suggested changing the outcome to providing advice around all things related to funerals during the project period, based on the experience of the service being contacted by clients in search of advice for planning their own funerals, rather than actually being bereaved.

### **3) Deliver 4 outreach events to local groups of pensioners**

This is a vitally important part of piloting and establishing the service.

### **4) Deliver 4 wider community outreach events**

Outreach events are a core part of Funeral Link's work, aiming to raise awareness of the service, as well as the profile of discussions around funerals and how to pay for them.

### **5) Achieve 80% success rate of Social Fund applications made with support from Dundee Funeral Support Service**

Networking and conversations with local partners and funeral directors revealed to Funeral Link that many of these organisations are completing the Social Fund applications with the bereaved. Funeral Link is aiming to obtain information on the success of applications from their clients.

### **6) Project will generate approximately £6,100 commission income over the project period**

The Q3 report sets out the challenges of meeting this outcome, relating to the shortened service live period, as well as the ethical and moral challenge posed by '*a social enterprise charity focussed on alleviating poverty taking a commission from those who are poorest in our community.*' The service has informally consulted with clients, third sector partners and funeral directors and established little interest in products for rent, and further investigations are on-going.

The service has been investigating alternative social enterprise ideas, but suggest accruing commission income would be difficult in the shortened time period for the pilot phase. They continue to explore opportunities of a commission income from those who could afford it, allowing those least able to afford aspects to access the service at a lower cost. Funeral Link are currently also exploring ideas around the dialogue concerning funeral planning, including education around Will writing and Power of Attorney, as well as a bereavement community café. They are also looking into the role of Ministers and celebrants and their services to explore ideas that could come forward in this area.

### **7) Reduction in number of Local Authority funerals from its current level of approximately 20 National Assisted funerals each year**

This was suggested by the manager to be a longer-term objective compared to other priorities. However, this could be removed fully as an objective of the service. Local authority funerals are generally taken up by those with no next-of-kin, or those who have next-of-kin who cannot or will not pay. Funeral Link would be unable to assist in circumstances where there is no next-of-kin, as they would have no-one with whom to liaise. They would also be unlikely to be able to help those next-of-kin who will not pay, as this can be related to complex family situations. There is a possibility that they could assist someone who is a next-of-kin who cannot pay, through advising around low-cost funeral options, but the numbers involved in this are likely to be very marginal, and in some circumstances, even a very low-cost funeral may be unattainable financially. In reality, Funeral Link have assisted in an estimated three funerals which might otherwise have been referred to the Local Authority for support with a funeral.

### **8) Reduction of cases dealt with by Dundee CAB**

The Citizens' Advice Bureau in Dundee report relatively low levels of cases they deal with which involve funeral debt as the main issue. Between April 2018 and March 2019 they had 12 people requesting help with Bereavement Payments, and 12 people requiring assistance with Funeral Payments. Discussions with CAB found that funeral problems can often be hidden within other debt issues and as such might not be recorded within the CAB advice code data as funeral issues. Funeral Directors are often the first point of advice for the bereaved, and CAB suggested that they were not often signposted to from funeral directors as somewhere for their clients to get advice. However, there would be a lot CAB could do to help people with payments for funerals e.g. assist with Social Fund applications, consider other applications e.g. Armed Forces Advice Project, Trusts of particular employers, churches etc.

Citizens' Advice Scotland are providing a new training module around funeral advice to Dundee CAB volunteers in March/April 2019. It is therefore possibly the case that statistics showing cases relating to funerals and payment may then actually *increase* in Dundee, as the volunteers as the first point of contact for CAB clients will be more aware of funeral issues and may probe further to find funeral problems tied further within debt problems presented. For these reasons, the measure of success looking at a reduction in the number of cases dealt with by Dundee CAB does not feel to be a helpful measure.

However, CAB and Funeral Link have held meetings and found that there will be a good scope for cross-referrals and positive linkages between the two organisations. CAB have money advice services which Funeral Link could refer people to for assisting with paying for a funeral, and also help people to make their applications for Social Fund payments. CAB will be able to cross-refer people to Funeral Link for specific funeral advice and support. Funeral Link will be attending the training session for CAS's funeral advice, and will be making the CAB volunteers aware of the service offered by Funeral Link. It would perhaps be a more meaningful measure for the measures of success to record the number of cross-referrals between Funeral Link and CAB for the purposes of the grant assessment.

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Services  
**139**

# Bus Timetable

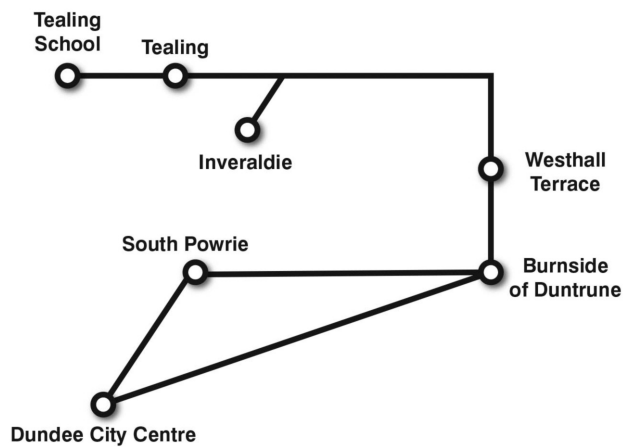
Tealing - Inveraldie - Murroes - Dundee  
(includes all services between Murroes and Dundee)

Leaflet 29

From 5 June 2017

**XPLORE**  
Dundee

 **Stagecoach** Strathtay



 **traveline**  
public transport info  
0871 200 22 33

 **ANGUS**  
on the go

 **Angus**  
Council



## Passenger Information

This leaflet contains details of local bus service 139, which runs between Tealing, Inveraldie, Murroes and Dundee City Centre. It also includes the section of local bus service 22 that runs between Murroes and Dundee. The publication is effective from Monday 5 June 2017.

### Changes to Service 139 since the August 2016 edition of this timetable

- There is an additional Monday to Friday service 139 journey commencing Dundee High Street at 08:40;
- The Monday to Friday service 139 journey from Dundee at 10:10 is withdrawn;
- The Monday to Friday 07:48 service 139 journey from Inveraldie to Dundee is now operated by Stagecoach Strathtay and commences 4 minutes earlier at 07:44;
- The Saturday service 139 journey from Dundee at 08:50 now commences 10 minutes earlier at 08:40; this also affects the return journey from Inveraldie now departing 7 minutes earlier at 09:02;
- The Monday to Friday and Saturday service 139 journey from Dundee at 12:30 now commences 5 minutes earlier at 12:25; this also affects the return journey from Inveraldie which now departs 6 minutes earlier at 13:00.

### Operator of the bus services shown in this leaflet

Xplore Dundee, 44-48 East Dock Street, Dundee DD1 3JS

Tel: Dundee (01382) 201121, office hours only

Web: [www.nxbus.co.uk/dundee](http://www.nxbus.co.uk/dundee)

Email: [travelcare@nationalexpress.com](mailto:travelcare@nationalexpress.com)

Service 22 and one service 139 journey is operated by:

Stagecoach Strathtay, Arbroath Bus Station, Catherine Street, Arbroath DD11 1RL

Tel: Arbroath (01241) 870646, office hours only

Web: [www.stagecoachbus.com](http://www.stagecoachbus.com)

Email: [eastscotland@stagecoachbus.com](mailto:eastscotland@stagecoachbus.com)

Further information on the services in this booklet can be obtained from the relevant operator on the numbers above. Alternatively, users can contact Traveline on 0871 200 22 33 (calls cost 12p per minute). Traveline can also provide details of local bus services for journeys across Scotland. Timetables are also available online at [www.angus.gov.uk/transport](http://www.angus.gov.uk/transport).

**A range of discounted day and weekly tickets are available on Service 22 and 139; passengers should contact the relevant operator for information.**

### Services on public holidays

No services will operate on 25/26 December or 1/2 January. On public holidays, a normal weekday service will generally be provided, though passengers are strongly advised to look out for on-bus notices regarding public holiday services. Alternatively, passengers can contact the relevant operator or Traveline for clarification.

### Comments and Suggestions

If you have a comment or suggestion about a bus service contained in this leaflet you should either contact the relevant bus operator or alternatively Angus Council's Transport Team at County Buildings, Market Street, Forfar DD8 3LG. The Transport Team can also be contacted by e-mail at '[PLNTransport@angus.gov.uk](mailto:PLNTransport@angus.gov.uk)'. All comments and suggestions will receive a written response.

If you have contacted the operator and have not received a response to your satisfaction you may wish to contact Bus Users Scotland at Hopetoun Gate, 8b McDonald Road, Edinburgh, EH7 4LZ or by e-mail to [enquiries@bususers.org](mailto:enquiries@bususers.org) enclosing a copy of all correspondence between yourself and the operator.

Bus Users Scotland's remit includes:

Incorrect fare charged	Accessibility	Attitude or behaviour of staff
Clarity of destination and route information	Personal security	Reliability and punctuality

Ultimate responsibility for the safe and proper operation of local bus services rests with the Scottish Traffic Commissioner. She can be contacted at Scottish Traffic Area, Level 6, The Stamp Office, 10 Waterloo Place, Edinburgh EH1 3EG or telephone 0300 123 9000.

**Tealing - Inveraldie - Westhall Terrace - Dundee Services 22 & 139****Mondays to Fridays**

	Operator:	STY	XD	STY	XD
	Service Number:	139	139	22	139
<b>Inveraldie Hall Place</b>		07:44	09:02	--	--
<b>Tealing School</b>		07:52	09:10	--	13:00
<b>Tealing Village</b>		07:55	09:13	--	13:03
<b>Westhall Terrace</b>		08:01	09:19	10:23	13:09
<b>Burnside of Duntrune</b>		08:07	09:22	10:27	13:12
<b>South Powrie</b>		--	09:24	--	13:14
<b>Dundee Seagate</b>		08:27	09:34	--	13:24
<b>Dundee Commercial Street</b>		--	--	10:38	--
<b>Dundee Whitehall St</b>		08:30	09:37	--	13:27
<b>Dundee Seagate Bus Station</b>		--	--	10:41	--

**Saturdays**

	Operator:	STY	XD	XD
	Service Number:	22	139	139
<b>Inveraldie Hall Place</b>		--	09:02	--
<b>Tealing School</b>		--	09:10	13:00
<b>Tealing Village</b>		--	09:13	13:03
<b>Westhall Terrace</b>		08:14	09:19	13:09
<b>Burnside of Duntrune</b>		08:18	09:22	13:12
<b>South Powrie</b>		--	09:24	13:14
<b>Dundee Seagate</b>		--	09:34	13:24
<b>Dundee Commercial Street</b>		08:29	--	--
<b>Dundee Whitehall St</b>		--	09:37	13:27
<b>Dundee Seagate Bus Station</b>		08:32	--	--

Operators: **STY** Journey operated by Stagecoach Strathtay  
**XD** Journey operated by Xplore Dundee

**Sundays** There is no Sunday service

**Dundee - Westhall Terrace - Tealing - Inveraldie Services 22 & 139****Mondays to Fridays**

	Operator:	XD	XD	STY	STY
	Service Number:	139	139	22	22
Dundee Seagate Bus Station		--	--	16:00	17:45
Dundee High St 4		08:40	12:25	--	--
Dundee Commercial Street 1		08:42	12:27	--	--
Dundee Commercial Street 3		--	--	16:04	17:49
South Powrie		--	12:38R	--	--
Burnside of Duntrune		--	12:40R	16:15	18:00
Westhall Terrace		--	12:43R	16:19	18:04
Inveraldie Hall Place		08:59	12:50	--	--
Tealing Village		09:08	12:57	--	--
Tealing School		09:10	13:00	--	--

**Saturdays**

	Operator:	XD	XD	STY
	Service Number:	139	139	22
Dundee Seagate Bus Station		--	--	17:45
Dundee High St 4		08:40	12:25	--
Dundee Commercial Street 1		08:42	12:27	--
Dundee Commercial Street 3		--	--	17:49
South Powrie		--	12:38R	--
Burnside of Duntrune		--	12:40R	18:00
Westhall Terrace		--	12:43R	18:04
Inveraldie Hall Place		08:59	12:50	--
Tealing Village		09:08	12:57	--
Tealing School		09:10	13:00	--

**Code: R** Journey operates via South Powrie, Burnside of Duntrune and Westhall Terrace on request to driver only

**Operators: STY** Journey operated by Stagecoach Strathtay  
**XD** Journey operated by Xplore Dundee

**Angus Council aims to provide access to information about services to all our customers. This document can be made available in large print.**

**Contact our ACCESS line on 03452 777 778.**

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**Leaflet 29**

Published by Angus Council ([www.angus.gov.uk/transport](http://www.angus.gov.uk/transport))

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Ref 20/00830/FULL-DMRC-4-22  
**Date:** 21 March 2022 09:20:02

---

My name is Sheila Dunbar  
Address Houletneuk Cottage the Duntrune, Dundee DD3 0PL  
Date 19th March 2022

I object most strongly to this application for all the same reasons I put forward before.  
Roads, Traffic, Agricultural vehicles, Health.  
Not a suitable place for a crematorium.

Sincerely  
Sheila and Alastair Dunbar

[Sent from Yahoo Mail on Android](#)

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Application no. 20/00830/FULL-DMRC-4-22 Attention: Ms S Forsyth, Legal & Democratic Services  
**Date:** 22 March 2022 22:31:40

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*First sent 15/03/2022: Resubmitted 22/3/2022 in case not received.  
Note - form letter used but extended.*

From  
Steve Smart  
2, Mill Cottage, Burnside of Duntrune, By Dundee, Angus, DD4 0PF.

Date: 15/3/2022

To  
Ms S Forsyth  
Legal & Democratic Services  
Angus Council  
Angus House  
Orchardbank  
Forfar DD8 1AE

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-22 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune**

**I refer to the abovementioned application for review received by Angus Council on the 1st March 2022 and for which I received formal notification of on the 11th March 2022. I fully support the refusal of the application for the reasons set out in the refusal notice dated the 24th January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:**

- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required, and
- The required sequential approach has not been undertaken properly which should have included sites within Dundee, and
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use, and
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside, and
- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues

For the above reasons I consider that the proposal does not comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016. Nothing the appellant has submitted provides sufficient

justification to set aside the policies.

**In addition to the above points**, I feel compelled to highlight that there has been a significant change to 'the bigger picture'. During the time that this appeal has been lodged, war has returned to mainland Europe. This is significant for many reasons, but specifically in this instance it matters as together Ukraine and Russia account for around 30 percent of global wheat exports and 20 percent of global corn exports. There is unlikely to be any export harvest from Ukraine this year, and it is also unlikely that we will see substantive trade with Russia for some time to come. Maximo Torero, the chief economist at the UN Food and Agriculture Organisation, recently warned that a world food crisis is immanent. Whatever else, we can say that for reasons of both food security, and environmental cost, this is most definitely not a wise time to surrender any viable agricultural land to urban development. In fact, we urgently - and soon, I suspect, desperately - need to grow more food.

For all of the above reasons, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely,

Steve Smart.

---

Steve Smart  
2 Mill Cottage  
Burnside of Duntrune  
By Dundee  
Scotland  
DD4 0PF

Email: [REDACTED]

**APPLICATION NO. 20/00830/FULL-DMRC-4-22**

**FROM: MR THOMAS BE GREENHILL**

**DATED: 22/03/2022**

**ADDRESS: CRAIGHILL FARM  
DUNTRUNE, BY DUNDEE DD4 0PH**

**APPLICATION FOR REVIEW ON BEHALF OF DUNTRUNE LTD (PREPARED BY BRODIES, ABERDEEN)**

**Erection of Crematorium Building and Associated Parking**

**REF: EFB/VB/BAT2494.00001**

Please see below response(s) to the specific numbered points within Applicant's above referenced document

## **1. EXECUTIVE SUMMARY**

1.1 Disagree – Please refer to the very many local, plus slightly farther afield, objectors

1.3 Strongly Disagree backed up and supported by 722 number of unique objectors. Surely, the large number of objectors dictate that this particular site is not the ideal site that families and mourners are seeking, ie to be attractive, restful and a comforting environment in which to say their last goodbyes.

1.4 All the previously submitted objections confirm to me, and obviously others, how strongly it is felt that this cannot be the suitable site.

1.5 Do not feel this is heavily prejudicing Angus residents. Don't consider that cost alone would be such a high priority for many people at this sad time. Moving away from their own closest crematorium would surely increase the travelling costs to and from thereby deleting the small saving from the actual cost of the crematorium. No guarantee Applicant would not just charge same as other local providers.

Agree competition is healthy, however, this just cannot be the best site in Angus by far.

1.6 Last sentence, "no impact on neighbouring properties" - Cannot disagree more, this must have great impact on the houses situated nearby, not to mention the inconvenience due to lack of road(s) infrastructure for the rest of us.

1.7.1 How come Parkgrove Crematorium is currently running at such a low capacity. Surely, any additional crematoria will only transfer any benefits within the Angus Community, rather than increase them.

1.7.2 Would people from areas in Dundee/other local towns in Angus who have been born, brought up, educated and spent their working lives in that kind of environment want their final goodbyes in a small Angus rural area that they may never have even visited before. Do not feel this site allows an even, fair choice to all. Again, any savings from a competitive chosen crematoria would be somewhat depleted thru travelling.

1.7.3 What other sites have been investigated and by whom? One quick example, the Aberdeen carriageway to Dundee, turn left at Toyota Garage, straight ahead there are roads along, there is road lighting already in place (for an Industrial site but not really utilised). In Dundee, however, only short distance away from current site under application but with much more to offer and ideal road conditions.

1.7.4 Must admit, cannot even begin to think about the disruption that, if chosen, this site could cause on the South-West route, ie going down and round the Bridge to Burnside of Duntrune or going round the Bridge and coming up the hill from Burnside of Duntrune.

One side of this hill is currently unfenced by Angus Council, due to cut-backs, only fluorescent posts. that continually get removed. The other side is gradually caving inwards a bit causing hiccups when a Bus or

any large Agricultural Machinery try to pass, nearly impossible (vehicles regularly come to a halt to enable this manoeuvre or reverse even back down the hill (Wing mirrors can touch at times). What happens when funeral attendees are on this road. How can this be the best site when roads are already “Unfit for current purpose without any further regular traffic”.

## **2. THE APPLICANT**

2.1 This bullet point describes the Applicant & Family very fully. This emphasises and confirms to us, as a Farming Business, the experience and knowledge the Applicant has and knows full well the implications of trying to pass cars and other vehicles whilst driving large Agricultural Machinery and / or combines on such small rural roads. This application leads to fears from others in the same business that it will make their lives more difficult and at the same time, adding additional costs, for them due to traffic congestion(s).

2.2 No comments

2.3 This seems to be in contrast to Applicant’s other reasons for providing Crematoria facilities, ie lack of, and how Angus Council desperately needs additional, competitive facilities, not to mention such a wonderful, environmental situation.

Applicant now saying we require to do this to remain viable. This statement clearly makes one feel that life is or could be tougher, what about the rest of us left to negotiate all traffic on the narrow roads surrounding our businesses to enable Applicant’s planned business to be carried out.

There are also many other areas of diversification to consider which, of course, the applicant will be aware of, ie tree planting thus, helping the environment at the same time, but allowing the rest of us to continue with current level of traffic to carry out our businesses.

2.5 Crematorium will employ 4 full time members. How could 3 services / day, ever make this a viable business considering running costs, overheads, etc. This bullet point clearly outlines an operator to run the facility. Who will be the owner in future when we, as locals, have the road problems.

## **3. SITE AND SURROUNDING AREA**

3.2 Comments OK, however, this cannot, by far, possibly be the best, desired location and site.

3.3 In past years when this field was in a Farming rotation and farmed by Neil Ogilvie (Applicant’s grandfathers day), this particular field grew successful Potatoes/Turnips/Grass and Cereals. At that time, it was a delight to drive past and see the neatly trimmed hedges kept up (no longer appear to be there). This site can therefore, and could be, good agricultural land, not the best, but viable. Lots of farmers have small, hilly areas that are still in their rotation successfully.

Clearly, the disadvantage for the Applicant in this case is that he is living probably 15 miles away from this site which makes it difficult to keep livestock there. The same applies to have machinery on site, when weather suits, for cultivation.

3.4 How can Burnside of Duntrune, Bridge, and Hill upwards and downwards, give good transport links to this site. AC cannot afford to fence the left-side of the hill coming northwards (due to cut-backs) and the other side is gradually caving out from the wood, both taking away from final road width for passing. Has the Applicant or any Road assessors actually driven or witnessed any large Agricultural Machinery on this specified road????

3.5 In previous years, the trees provided a screening from local dwelling houses and the C4 road, however, this is no longer the case.



#### **4. THE PROPOSED DEVELOPMENT**

4.3 Why not return it to its previous Agricultural form/rotation allowing big majority of the locals their wish, not to have such a site, when they are the ones that will be inconvenienced. Why should we be left with the consequences whilst the Applicant lives outwith the area/site.

#### **5. DETERMINATION OF THE APPLICATION**

5.3.2. "reasonable separation between activities" within the site and those that reside closest to the development there will be no detrimental impact. Disagree, if there is a row of cars awaiting entry to the site and Agricultural vehicle(s) at the end of the line, IT/THEY MUST WAIT. Of course, there will be a detrimental impact to public road users. Cars leaving the site and "turning right" onto the public road would surely be more than detrimental.

Road(s) alone will create many tailbacks and activities, ie detrimental impact

5.3.10 The Council's Road Service is satisfied that the traffic from the development can be accommodated within the local road network. Feel strongly, the South-West road is a disaster for lines of traffic when meeting large Agricultural vehicles. Please see 3.4 above.

#### **6. TAYPLAN POLICIES**

6.6.4 The Applicant's appeal states "A hearse drives at approximately 60% of normal road speeds, partly as a mark of respect, but also to keep the cortege vehicles together so that they arrive at the crematorium together. It is accepted that in rural areas, drive time may require to be slightly longer.

Above para confirms cortege vehicles prefer to drive together and, also at a slower pace (mark of respect), and may require slightly longer in rural areas. It is tough enough for Agricultural Machinery to negotiate surrounding roads as at present without any further traffic escalation / delays.

6.6.7 From Applicant's Appeal document "Funeral Poverty in Dundee" Would people from areas in Dundee who have been born, brought up, educated and spent their working lives in that kind of environment want their final goodbyes in a small Angus rural area that they may not ever have visited before?

6.8 From Applicant's Appeal document "It is submitted that this information demonstrates a specific local need for another crematorium in Angus and the Officer has failed to apply sufficient weight to the ability of the proposed development to prevent "leakage" of business outwith Angus to Dundee". This immediately raises the question why would a further crematorium not be situated in Central Angus rather than on the boundary with Dundee? Clearly, the current proposal does hope to recruit business from Dundee – "Funeral Poverty In Dundee" to improve choice for the consumer however, at the same time, don't let Angus leak into Dundee!! See 6.6.6 refers to combined population.

6.9 Sorry, but 24 car trips per cremation, could easily make it profit or loss for local farmers and other businesses if, and when, they are trying to secure or produce their crops in inclement weather should they be faced with hold-ups due to convoy(s) of cremation cars whenever they hit local roads.

#### **7. LDP POLICY DS1**

7.1 "there are no suitable and available brownfield sites capable of accommodating the development". Do we have evidence re this. What sites have ever been looked at??

7.4 Again, "there are no suitable available brownfield sites or land ..... With the spare areas sitting idle within outskirts of Dundee alone, find this hard to comprehend. There is an area of land, north of Whitfield, going in at the Toyota garage with road infrastructure, street lighting, etc which was previously allocated for Industrial area but still idle – just one example if we are happy to select the current

Application which is so, so, close anyway to the border of Dundee with very poor roads!! The Application sounds that the Applicant would be happy to recruit from both Angus and Dundee.

## **8. LDP POLICY DS2**

8.2 How could 3 cremations/day ever begin to pay. Even at the rate of 3/day – this is huge implications for local farmers if the rain is hanging overhead and they are desperate to gain access to and from fields, finding themselves either in a queue, or, trying to reverse down the Burnside Hill with large Farming machinery. It happens so often. Again, no mention of inconvenience to such large pieces of machinery or the greatly increased use of on-line delivery vehicles of all sizes.

8.2.1 “sometimes distressing nature of the event” – The Burnside of Duntrune Hill, north and south will certainly create distress for many drivers.

**End of last bullet point in Section 8.2.1** – no mention again of large Farming machinery or increased use of on-line delivery vehicles of all sizes.

### **8.2.2. Make provision for suitable located public .....**

All to the detriment of local farmers, businesses, on-line deliveries, and local residents.

### **8.2.3 Bus stops**

Has the Applicant himself encountered buses and electric vehicle(s) picking up and dropping off passengers when he is trying to reach his own fields on a daily-basis and at times of inclement weather?

8.2.5 Cycling. Poor drainage / puddles / floods of water on local roads for poor mourners all dressed for a funeral service and their last goodbyes. AC have had no funds, due to cut backs, over past 6 years to put in new drains / gullies to take water away. How much space would a cyclist have meeting an HGV vehicle on some of these corners.

8.2.6 Para 4-5. Again, no mention of the South-West road.

## **11. MATERIAL CONSIDERATIONS**

11.6 Who pays for Electric Vehicle(s). If mourners have to contribute, this would clearly increase their cremation costs.

Surely, there is a site in Angus or Dundee without the requirement of vehicles being supplied.

### **Statutory Consultations**

11.9 It is interesting that the local community and surrounding area(s) put forward such a high number of objectors, indicating no disinclination to travel the short distances required to either of the other local crematoria, to say their last goodbyes rather than have this new building situated on their doorstep.

### **Third Party Representations**

11.14 Some / many of us did take the time and effort to do an individual letter rather than updating template.

I can honestly say I was never at any time stopped, harassed, or questioned re my thoughts and ideas about this Planning application. My past and present experience with local roads, near misses, and accidents over 48 years made me shiver at the thought, thus drawing my own conclusions as to the outcome of such an Application.

11.16 Please can we again draw attention to the South-West road from the site. I can honestly say I have never at any time been aware of, or, applied any pressure to anyone re this site. I have, however, heard many times that the surrounding roads were a disaster / rubbish for such a venture.

New visitors to the area would have to encounter some roads that they may have never been on before and I often think of people upwards of 65 trying to encounter the Dundee – Aberdeen, road on a foggy Winter’s evening following their last goodbyes!! Makes me cringe at the thought if they attempt to cross that road taking a right turn on a Friday pm when all the Aberdeen traffic are heading home for the weekend. Early afternoon onwards it starts.

#### CONCLUSION

12.1.1 Disagree.

12.1.2 Disagree.

12.1.3 How has this been backed up.

12.4 As a local resident, certainly do not agree with this statement “much needed development”. Happy with what we have!!

Thomas BE Greenhill

22nd March 2022

**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Further Objection: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 14 March 2022 15:15:08  
**Attachments:** [Crematorium appeal response letter.docx](#)  
**Importance:** High

---

Many thanks for the notification. I hereby attach my letter outlining my further objections to this proposal and its appeal.  
I would be grateful if you would acknowledge receipt of this letter.

Many thanks  
Wendy Nicoll

----- Original Message -----

From: "Sarah Forsyth" <ForsythSL@angus.gov.uk>  
To:  
Sent: Friday, 11 Mar, 2022 At 19:11  
Subject: Application for Review - Land North East of Duntrune House,  
Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council’s Development Management Review Committee. A copy of the Council’s Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days

from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)

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14 March 2022

Ms S Forsyth  
Communities Officer  
Angus House  
Orchardbank Business Park  
Forfar  
DD8 1AE

Mrs Wendy Nicoll  
1 Braeside Cottages  
Burnside of Duntrune  
Dundee  
DD4 0PF

Dear Ms Forsyth

**Re: Review of Planning Application Ref: 20/00830/FULL – DMRC-4-2 (Alternative ref 22/00004/REFUSE)  
Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and  
Boundary Enclosures at Land North East of Duntrune House, Duntrune**

I refer to the above application for which I received formal notification on the 11 March 2022.

I fully support the *refusal* of the application for the reasons set out in the refusal notice dated the 24 January 2022 and take this opportunity to re-confirm my objection to the proposal, on the following grounds:

- The proposed development which will attract a significant level of traffic onto the substandard local rural roads, will lead to very real road traffic safety issues. There are many pedestrians, horses and cyclists using the access roads to this site, which have many blind corners and are already very dangerous with numerous close calls and several recent accidents.
- There is no need for the proposed crematorium, both existing facilities at Dundee and Friockheim having capacity if required.
- The required sequential approach has not been undertaken properly which should have included sites within Dundee.
- The development site is not and cannot be made accessible by a variety of modes of transport, resulting in increased reliance on the car, for this significant traffic generating community use.
- The development is wholly inappropriate and incongruous within this rural area and will have a detrimental impact on the rural landscape resulting the suburbanisation of the countryside

For the above reasons I consider that the proposal does *not* comply with Scottish Planning Policy, TAYplan Policy 1 Location Priorities, Policy 2 Shaping Better Quality Places, and Policies DS1: Development Boundaries and Priorities, DS2: Accessible Development, DS3: Design Quality and Placemaking, and TC8 Community Facilities, of the Angus Local Development Plan 2016.

Nothing the appellant has submitted provides sufficient justification to set aside the policies. Therefore, I would request in the strongest possible terms that the Review currently under consideration is dismissed and planning consent is refused.

Yours sincerely



Mrs Wendy Nicoll

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#); [Ian J Robertson](#)  
**Subject:** Duntrune crematorium  
**Date:** 13 March 2022 17:12:22

---

Dear Ms.Forsyth, I have read the appeal for the crematorium and it all sounds lovely, the applicant is a local farmer - sorry he lives in Friockheim and has no knowledge of the traffic conditions around Duntrune, he claims the field is grade 3 and difficult to harvest and plough, every farmer around Duntrune has fields like that which are cultivated every year so that claim is without substance.

The access to the site is on a stretch of road with two bends within 100 metres and the proposal is there would be a one-way system internal to the site which would bring these openings even closer to the bends. This road has been correctly defined as rural, but Friockheim is a rural road to nowhere, the road at Duntrune is a road that has become increasingly used as a commuter route by the ever increasing new housing in the area along with the two large farms who use this road for access to their fields.

The comment about putting in a bus stop is laughable, there are no scheduled buses use that section of the road, and having a courtesy vehicle would not work, people want to use their cars.

The road from Burnside of Duntrune to the site is very narrow and has no chance of being widened thanks to the topography, if a bus, HGV or tractor is on that bend cars have to reverse back to allow them past.

I could have used one of the templates provided for my objection, but I feel it is more personal to give my own opinion.

Best regards, W.D.& P.C.Stewart  
Burnside House,  
Burnside of Duntrune  
DD4 0PF

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 13:49:15

---

Hi,

Thank you for the email. To confirm I still very much support this application and hope it gets approval at review. This area desperately needs another crematorium.

Regards,

Alex

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**Jane Conley**

---

**From:** Andrew Law [REDACTED]  
**Sent:** 25 March 2022 20:11  
**To:** Sarah Forsyth  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune

Good evening, think having another crematorium would help keep the cost of funerals down, especially in these financial times with prices going up, can only be good for the future, to have more of a choice.

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---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:14:10 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

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I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 18:16:20  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Hi Sarah

I am still in full support of the application and feel the area is definitely in need of another crematorium.

Arthur

Sent from my iPhone

On 11 Mar 2022, at 19:10, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 18 March 2022 15:53:56

---

Hi Sarah

I'd like my letter of support passed on for consideration to the panel.

I feel there is a serious need for a crematorium in the area due to the very long wait times and our local crematorium being the most expensive in the country

Thank you

Beth

Sent from [Mail](#) for Windows

---

**From:** [Sarah Forsyth](#)  
**Sent:** 11 March 2022 19:12  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune  
**Importance:** High

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
Application No 20/00830/FULL - DMRC-4-22**

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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

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## Jane Conley

---

**From:** Bruce Ewart [REDACTED] >  
**Sent:** 25 March 2022 12:51  
**To:** Sarah Forsyth  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune

Hi Sarah,

I am still in favour of this planning application.

Thanks  
Bruce

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---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:08:43 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

### **Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Fw: Fwd: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 21:36:27  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Dear Sarah

Thank you for the notification. I remain strongly in support of this application for the reasons preciously detailed.

It is vital that the Angus and Dundee area has a choice and that we try to eradicate funeral poverty. This application has been well thought out and will bring significant benefit to the community.

I hope the review results in the application being approved.

Kind regards

Cate Hodgson

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
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Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 20:45:23  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Dear Sarah,

I am writing to confirm that I still support the application as the area is desperately in need of another crematorium

Kind regards,  
Cat Lammas

Sent from my iPhone

On 11 Mar 2022, at 19:07, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
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Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 13 March 2022 10:26:03

---

Dear Sarah,

My original letter of support still stands.

Best regards,  
Charlie

Sent from my iPhone

On 11 Mar 2022, at 19:08, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
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Sarah

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<D3 Decision Notice 20\_00830\_FULL dated 24 January 2022.PDF>

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 22:53:03  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

To who it may concern,

I confirm I still fully support this application as the area desperately needs another crematorium.

Regards,

Danny McGuff

On 11 Mar 2022, at 7:10 pm, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** application crematorium Duntrune  
**Date:** 16 March 2022 06:47:12  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)

---

Good Morning,

Further to your recent correspondence regarding the application at Duntrune for a new Crematorium, I support the application. The Crematorium situated at Friockhiem is one of the most expensive in the UK and an alternative option is urgently required.

Yours Sincerely  
Douglas Bain

[REDACTED]  
**Head of Ground Contracting**



Telephone: [REDACTED]  
Elliot Industrial Estate, Arbroath DD11 2NJ | [www.agrii.co.uk](http://www.agrii.co.uk)

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Masstock Arable (UK) Ltd | 2387531 | Andoversford, Cheltenham, GL54 4LZ | Tel: 01242 821100

United Agri Products Ltd | 02798041 | Andoversford, Cheltenham, GL54 4LZ | Tel: 0845 607 3322

---

**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 20:55:50

---

Dear Sarah,

Many thanks for your email. I still support the application because I strongly feel that the area is in need of an additional crematorium.

Best wishes,  
Eleanor Gibson

On 11 Mar 2022, at 19:10, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

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The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other

documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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<D3 Decision Notice 20\_00830\_FULL dated 24 January 2022.PDF>

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 15:50:06  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Hi Sarah,

Thank you very much for your email.

I still strongly support the application - the area is in desperate need of another crematorium.

Thanks, Fiona

Sent from my iPhone

On 11 Mar 2022, at 19:14, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
Application No 20/00830/FULL - DMRC-4-22**

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Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 18:21:09

---

Good Evening,

I am still very much in support of the original application the area needs another crematorium to reduce the charges currently being made for cremations in Angus

Thank you

Hannah Stirling

On 11 Mar 2022, at 19:14, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

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Kind regards

Sarah

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[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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<D3 Decision Notice 20\_00830\_FULL dated 24 January 2022.PDF>

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Fwd: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 16:43:49

---

**Dear Ms Forsyth,**

**Thank you for your email, my original support for the above scheme still stands. The area of Angus needs to have another crematorium to give the consumer more choice & hopefully bring down the cost. I lost my mother last year so I know how expensive a nice funeral can be.**

**Yours faithfully,**

**Hilary Knight**

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>

**Sent:** Friday, March 11, 2022 7:02:29 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants



dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

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I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985|  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:Sarah.Forsyth@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 13:57:52

---

Good Afternoon Sarah,

I'm not aware whether you will have been able to review a few documents I attached to my original reply, showing support for the approval of this crematorium. It shows some analysis of how much the cost of a funeral in the Angus area in terms of 'disposable income' for people's households vs the rest of the UK, and how this is wholly unfair for families needing to take on the burden after experiencing such personal loss.

The inequity is transparent. The cost of the most basic cremation in the Dundee area is £1070 - this is in line with the other 4 most expensive places in the UK to be cremated (<https://www.funeralguide.co.uk/blog/cremation-and-burial-costs>). However the average household income is far less in Dundee and Angus area than anywhere else in the next 40 most expensive crematorium locations. This just shows the imbalance of monopolistic power that has been pushed upon grieving families for the last few years. In my own experience I have had two family members in the last 3 years to pass away (albeit a fairly low number in comparison to friends during the pandemic). But I couldn't believe this number and surely the only reason why prices are so high, is because supply is so low that they can charge this disproportionately expensive price tag? Either way, Dundee and the Angus areas are in desperate need for more crematoriums, during a period of time when income is going to be stretched further than ever before this is a much needed development.

If you would like any of the more detailed research I did on this - I'd be happy to resend/update it and have a chat.

Kind regards,

Howell Harrod

On Fri, Mar 11, 2022 at 7:05 PM Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**

**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**

**Application No 20/00830/FULL - DMRC-4-22**

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I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

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I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 06:39:04  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Hi Sarah,

Thank you for sending this through. I would like to say that I still strong support this application. The area desperately needs a crematorium.

Best wishes,

Jack Paladini

Sent from my iPhone

On 11 Mar 2022, at 19:09, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd  
Application No 20/00830/FULL - DMRC-4-22**

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I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [PLNProcessing](#)  
**To:** [Sarah Forsyth](#)  
**Subject:** FW: Correspondence for Land North East Of Duntrune House Duntrune - 20/00830/FULL  
**Date:** 17 March 2022 09:44:15

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**From:** Jessica Ritchie [REDACTED] >  
**Sent:** 17 March 2022 08:59  
**To:** PLNProcessing <PLNProcessing@angus.gov.uk>  
**Subject:** Re: Correspondence for Land North East Of Duntrune House Duntrune - 20/00830/FULL

Dear Sarah

I wish to assert my continuing support for this application.

I am in favour of the proposals and trust that the review will result in the proposal being approved.

Kind regards

Jessica Ritchie

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**From:** PLNProcessing <[PLNProcessing@angus.gov.uk](mailto:PLNProcessing@angus.gov.uk)>  
**Sent:** Wednesday, March 2, 2022 4:14:06 PM  
**Subject:** FW: Correspondence for Land North East Of Duntrune House Duntrune - 20/00830/FULL

**Planning Application Reference : 20/00830/FULL**

Please see attached notification of the decision on planning application 20/00830/FULL.

A notification to interested parties was sent by Angus Council on 25 January 2022 but it has been brought to our attention that some parties have not received this notification and as such it has been re-sent.

Yours faithfully,

Planning Service  
Encl.

Dear Sir/Madam

**Planning Application Reference : 20/00830/FULL**

I refer to our previous correspondence in connection with the application by Duntrune Ltd for the Erection of Crematorium Building and associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East Of Duntrune House Duntrune .

The application has now been determined under Angus Council's Scheme of Delegation to Officers. A copy of the Decision Notice is attached for your interest and approved or refused drawings can be viewed at <http://planning.angus.gov.uk/online-applications/> using the reference number provided above. A copy of the Report of Handling that explains how the application has been considered can also be viewed at that location.

If calling or telephoning please ask for Ed Taylor on 01307 492533 or e-mail [taylor@angus.gov.uk](mailto:taylor@angus.gov.uk).

Yours faithfully,

Planning Service  
Encl.

---

**From:** PLNProcessing

**Sent:** 25 January 2022 15:27

**Subject:** Correspondence for Land North East Of Duntrune House Duntrune - 20/00830/FULL

Please see attached correspondence.

Regards.

Veronica Caney | Technical Assistant (Development Standards Planning) | Angus Council | 01307 491847 | [caneyv@angus.gov.uk](mailto:caneyv@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 23:25:31  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

---

Good Evening Sarah,

I hope this finds you well!

I would like my original letter of support given to the Councillors involved please.

Also I would like to add the how desperately the area really needs another Crematorium to reduce the charges currently being made for cremations in Angus. The cost comparable to the rest of the UK is shocking due to them being the sold crematorium in Angus.

Many thanks,  
Jessica

Sent from my iPhone

On 12 Mar 2022, at 03:05, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

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I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.

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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** RE: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 19:51:45

---

Dear Sarah,

Thank you for your email.

I would like my original support to be put forward as I believe Angus desperately needs another crematorium.

Kind regards  
John Hair

Sent from [Mail](#) for Windows

---

**From:** [Sarah Forsyth](#)  
**Sent:** 11 March 2022 19:03  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune  
**Importance:** High

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

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Kind regards

Sarah

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**From:**   
**To:** [Sarah Forsyth](#)  
**Subject:** Planning Application  
**Date:** 24 March 2022 20:54:44

---

Dear Sir/Madam,

I am emailing you about the rejected planning application for another crematorium in Angus.. I would like it to be noted that I still support the application and feel that another Crematorium is needed in Angus as the current one is the most expensive one in the UK.

Regards,

Karen Tough

Sent from [Mail](#) for Windows

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 21:48:52

---

To Whom This May Concern

I would like to reiterate that a new crematorium at Duntrune is desperately needed. To be quite honest I am struggling to understand the points/comments for refusal and actually find them quite baffling.

The waiting time for arranging cremation is increasing because of the lack of facilities in the area, this then has a detrimental impact on families suffering when they are preparing to say their final farewell to their loved ones.

I truly hope that the Planning Authority will seriously review the application and make the correct decision and give the building of a new crematorium the green light.

Regards  
Kirsty Caird

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---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:10:13 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | [ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)  
| [www.angus.gov.uk](http://www.angus.gov.uk)  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 18:45:17

---

Good evening,

I would like to support the application.

This area has some of the most expensive crematorium charges in the U.K. and the area desperately needs more competition and choice. This site is ideal for such use.

The refusal on the basis of a lack of public transport is unreasonable. On the basis of the refusal reasons, no development could take place unless served by a current public bus route. That is clearly unreasonable because no other more suitable alternative site fulfilling all the various very detailed planning and environmental criteria for a crematorium - on a public bus route - can be identified. The policy has a preference for sites that are served by public transport where possible - but where no other suitable sites can be identified, the Council's refusal entrenches the current anti-competitive situation, driving up cremation charges against the public interest.

In addition, the applicant is proposing to provide a private bus service.

Regards,

Lloyd Garvie  
21 Melville Street  
Edinburgh  
EH3 7PE

On 11 Mar 2022, at 20:09, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
**Application for Review – Refusal of Planning Permission for Erection of Crematorium Building and Associated Parking, Access, Turning Space, Landscaping and Boundary Enclosures at Land North East of Duntrune House, Duntrune – Duntrune Ltd**  
**Application No 20/00830/FULL - DMRC-4-22**

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review of the decision taken by the Service Lead – Planning and Sustainable Growth. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee. A copy of the Council's Decision Notice is attached for your information.



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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 |  
[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)  
Work pattern: Mon, Tues (am) & Thurs

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<D3 Decision Notice 20\_00830\_FULL dated 24 January 2022.PDF>

**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 20:38:45  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

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Good evening Sarah,

I am writing to confirm my continuing support for this application and it is my hope that it will be approved as it is important that Angus has another crematorium.

Kind regards,

Olivia Ritchie

Sent from my iPhone

On 11 Mar 2022, at 19:02, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013  
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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 16 March 2022 12:29:08  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

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Hi Sarah,

I would like my original letter of support for the crematorium given to the councillors involved  
Angus needs another crematorium as the wait times for current services is far too long

Thank you

Patti Smith  
Sent from my iPad

On 11 Mar 2022, at 19:03, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

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Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 18:29:19  
**Attachments:** [D3 Decision Notice 20\\_00830\\_FULL dated 24 January 2022.PDF](#)

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Sarah, in regards to this Application, I would like to reiterate that I still fully support the application and would further like to re-stress the point that I believe Angus residents should be given the chance to have a choice about cremation options.

Peter Stuart

Sent from my iPad

On 11 Mar 2022, at 19:12, Sarah Forsyth <[ForsythSL@angus.gov.uk](mailto:ForsythSL@angus.gov.uk)> wrote:

Dear Sir/Madam

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Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](mailto:ForsythSL@angus.gov.uk)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 15 March 2022 19:14:33

---

Hello Sarah, Thank you for email :

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
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**Application No 20/00830/FULL - DMRC-4-22**

I wish to advise you that my original support for this application still stands, Angus requires another Crematorium to hopefully reduce the cost for cremation - it currently being the most expensive in the UK.  
Yours Sincerely

Ron Gardiner

---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** 11 March 2022 19:01  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
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Kind regards

Sarah

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**From:** [REDACTED]  
**To:** [Sarah Forsyth](#)  
**Subject:** Re: Application for Review - Land North East of Duntrune House, Duntrune  
**Date:** 13 March 2022 10:28:32

---

Dear Sarah,

Thank you for your email.

I would like to confirm that my letter of support still stands in favour of the Crematorium construction.

If there is anything else needed, please inform me.

Thank you and Kind regards,  
Samuele Di Carmine.

---

**From:** Sarah Forsyth <ForsythSL@angus.gov.uk>  
**Sent:** Friday, March 11, 2022 7:04:57 PM  
**Subject:** Application for Review - Land North East of Duntrune House, Duntrune

Dear Sir/Madam

**Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013**  
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Sarah

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