



# **Cemetery Strategy**

Armagh, Banbridge and Craigavon  
Council

This report has been  
prepared by Lee  
Snashfold in June 2025  
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# Cemetery Strategy

Armagh, Banbridge and Craigavon Council

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## 1. Vision

- 1.1 To meet the needs of the bereaved within the communities of Armagh, Banbridge and Craigavon Council (ABC) and beyond by creating pleasant, friendly and sympathetic resting places in their cemeteries. The council will endeavour to maintain all its cemeteries to create an accessible, pleasant, peaceful and tranquil environment.
- 1.2 Armagh, Banbridge and Craigavon Council will manage all burials with compassion, competency and efficiency, to ensure each interment is carried out sensitively and in a dignified manner. In recognising that the Armagh, Banbridge and Craigavon Council area is a culturally diverse place, the authority aims to meet the needs of all religions, ethnic and cultural groups.

## 2. Purpose & Aim

- 2.1 Burial within a cemetery has historically been the preferred choice for the bereaved within the authority boundaries and the wider communities of Northern Ireland, with circa 77% of recent deaths in Northern Ireland resulting in burial. Grave spaces have traditionally been provided in either council cemeteries or church graveyards - council led cemeteries are starting to become the more common choice, in part due to increasingly limited availability in church graveyards.
- 2.2 There is therefore a clear need for the continued provision of burial space within the authority.
- 2.3 However, it is recognised that cremation is progressively becoming a popular option to the bereaved, with an increasing number of people in Northern Ireland choosing cremation over burial and cremation being accepted by most faith or cultural denominations.
- 2.4 The aim of this strategy is to provide an overview of the authority's existing cemetery service and a review of the present, short and long term needs for cemetery provision for the authority.
- 2.5 Although cremation is a limited option for the people of Northern Ireland with only two crematoria in operation – Belfast City and Antrim & Newtownabbey - this cemetery strategy will bear in mind the growing trend and the likelihood that cremation will continue to become an increasingly more popular option in years to come.
- 2.6 The authority wishes to review and strategise existing, new and alternative options for the provision of a cemetery service which meets the immediate and future demand of the communities it serves – this includes traditional cemetery burial as well as

incorporating the clear demand for cremation and an appropriate possible resting place for a person's cremated remains thereafter

### 3. Introduction

- 3.1 Lee Snashfold, a Bereavement Services Industry Professional with 44 years' experience and Managing Director of "Lee Snashfold Crematoria Management & Consultancy Ltd" (LSCMAC), was requested to carry out a strategic review of all aspects of the burial service offered by Armagh, Banbridge and Craigavon (ABC) Council (the authority). From this, he was to also produce a cemetery strategy.
- 3.2 From the experience of Mr. Snashfold, the experience of his company and the findings of the strategic review, this strategy for the cemeteries operated by the authority has been produced. The Operational Review document and this strategy should both be used to aid the service.
- 3.3 This strategy is to provide an overview of the authority's burial services, assessing the existing service, exploring existing options offered to the communities of Armagh, Banbridge and Craigavon, and to strategise feasible options in the coming years to aid, improve and/or benefit the service.
- 3.4 This strategy includes aspects of the management and operation of the authority cemeteries. These range from maintenance, health and safety, compliance checks to memorial testing.
- 3.5 Being current at the time of production, this strategy is subject to change over time and should be updated accordingly with the appropriate trends, legislation and regulation.

### 4. Statutory Context

- 4.1 Being a provider and operator of burial services to communities in Northern Ireland, the authority is bound by the relevant legislative and regulatory frameworks contained within the following:
  - Burial Grounds Regulations (Northern Ireland) 1992
  - Public Health (Ireland) Act 1878
  - Public Health Act (Northern Ireland) 1967
  - The Welfare Services Act (Northern Ireland) 1971
- 4.2 It is important that each officer of the authority operating within their cemeteries is aware of and can refer to each document within the above, particularly the Burial Grounds Regulations (Northern Ireland) 1992 to aid with structure, legislative

standards and best practice when executing their duties, as the 1992 Regulations govern the management, regulation and control of burial grounds in Northern Ireland.

- 4.3 It could be beneficial for the authority to reference Local Authorities Cemeteries Order (LACO) 1977 which applies to England and Wales for any areas they feel are not covered by The Burial Grounds Regulations (NI) 1992.
- 4.4 Public Health (Ireland) Act 1878 Section 175 allows local authorities to acquire land for the purpose of providing burial grounds:
- 4.5 175: It shall be lawful for the burial board to contract for and purchase any lands, and buildings thereon, for the purpose of forming a burial ground, or for making additions to any burial ground formed or purchased under the Burial Grounds Acts or this Act, as such the board may think fit, or to purchase from any company or persons entitled thereto any cemetery or cemeteries or part or parts thereof, subject to the rights in vaults and graves and other subsisting rights which may have been previously granted therein.
- 4.6 The 1878 Act enables a council to acquire land for the purpose of burial, but it does not place any legal obligation on them to do so - although there is a moral expectation for them to do so.
- 4.7 Part VI Section 17(1) of the Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1985 states: 17(1) A Council may provide and maintain a crematorium. Although the only recognised 'Cremation Authority' under the Cremation (Belfast) Regulations (Northern Ireland) 1961 is Belfast City Council, it is the 1985 Order which allowed Antrim & Newtownabbey Borough Council to pursue their crematorium which opened June 2023. Part VI Section 17(1) permits a council to provide a crematorium but places no legal obligation on it to do so.
- 4.8 Local authorities are legally obligated under the Welfare Services Act (Northern Ireland) 1971 to provide for the disposal of a body when no other arrangements are made. These arrangements are often referred to as welfare funerals or public health funerals.

## 5. Facilities and Demographic Profile

- 5.1 As of 2022, Armagh, Banbridge and Craigavon has a population of 220,000. In 2022 there were 1,765 deaths registered in the district, representing over 0.8% of the borough population. This is less than the Northern Ireland national death percentage at 0.9% which usually represents a younger demographic than the national average. (Source: Deaths by sex, age and local government district 2022)

5.2 77% of deaths in Northern Ireland result in burial. 77% of the 2022 deaths in ABC should equate to 1,359 burials, however the authority carried out some 500 burial services within 2022.

5.3 Armagh, Banbridge and Craigavon Council currently operates and maintains 15 cemeteries, these being:

- Aghagallon Cemetery, Rock Lane, Aghagallon
- Ballynahone Cemetery, Ballynahonemore Road, Armagh
- Banbridge Cemetery, Newry Road, Banbridge
- Donaghcloney Cemetery, Main Street, Donaghcloney
- Dromore New Cemetery, Mound Road, Dromore
- Drumadonnell Cemetery, Dromara Road, Ballyronney
- Kernan Cemetery, Kernan Hill Road, Kernan, Portadown
- Lurgan Cemetery, New-Line, Lurgan
- Lynastown Cemetery, Bluestone Road, Portadown
- Magheralin Cemetery, Newforge Road, Magheralin
- Old Annaclone Cemetery, Church Hill Road, Annaclone
- Seagoe Cemetery, Seagoe Road, Portadown
- Seapatrick Cemetery, Church Square, Banbridge
- Shankill Cemetery, Shankill Street, Lurgan
- The Orchard Cemetery, Corcreevy Road, Richhill

5.4 Of the 15 cemeteries listed, as of April 2025, there are 6 cemeteries with available space for new graves, detailed as below:

New Burials Only	2020		2021		2022		2023		2024		Total	Mean	Available Plots	Life Span yrs	Plot Sale End	Extension	Spare Acreage
	D	Plot Sales															
Kernan	12	80	15	80	18	95	10	80	16	82	417	83.4	1930	23.14	2047	2037	10 acre Agricultural lease
Lurgan	10	55	9	59	10	69	8	65	6	73	321	64.2	262	4.08	2028	2020	18 acres Agricultural lease
Ballynahone	1	19	3	21	1	12	2	15	2	12	79	15.8	679	42.97	2067	2055	4 acres
The Orchard	1	14	2	21	1	13	1	10	1	15	73	14.6	158	10.82	2034	2026	to be purchased
Banbridge	6	56	4	48	5	48	6	40	3	30	222	44.4	2014	45.36	2069	2055	to be purchased
Dromore	1	11	1	11	2	18	2	11	3	26	77	15.4	190	12.34	2036	2027	3 acres Agricultural lease
Total Plot Sales		235		240		255		221		238		Total Plots	5233				

- 5.5 In addition to the cemeteries named above, there are a further 16 closed churchyards under control of the authority.
- 5.6 Armagh, Banbridge and Craigavon Council is the second largest council in Northern Ireland in terms of population, after Belfast (based on 2022 statistics).
- 5.7 Between 2012 and 2022 the population within the authority increased by circa 8.7% (compared to 4.7% over the same period for NI as a whole). The authority has published estimates that from 2020 to 2043, growth of the population within the authority can be expected at circa 15.5%, which would be an increase of 33,638 people – NI as a whole over the same period has a projected population increase of 4.9%.
- 5.8 It is clear that the population of the authority is growing at a significant rate when compared to the NI overall statistics, and this in turn is likely to impact the number of deaths registered within the authority, which is likely to increase service use – particularly given that between 2012 and 2022 the population of both age groups “50 to 64” and “65 and over” increased by 25% [Source: Mid-Year Population Estimates, NISRA]. This will likely increase the pressures on the cemetery services, therefore making it crucial that the service delivery is efficient, effective and benefits the bereaved and the communities in as best a capacity as possible for the years ahead. Given this, it is important that the authority continues to extend their cemetery spaces on schedule to allow for the required capacity.
- 5.9 The below has been taken from the Census 2021 data noting the demographic profile and suggested faith mix of the population within the authority at the time:

	<b>Armagh City, Banbridge and Craigavon</b>	<b>%</b>
<b>White</b>	211,429	96.69%
<b>Irish Traveller</b>	534	0.24%
<b>Roma</b>	205	0.09%
<b>Indian</b>	617	0.28%
<b>Chinese</b>	683	0.31%
<b>Filipino</b>	406	0.19%
<b>Pakistani</b>	278	0.13%

	<b>Armagh City, Banbridge and Craigavon</b>	<b>%</b>
<b>Arab</b>	116	0.05%
<b>Other Asian</b>	581	0.27%
<b>Black African</b>	1,132	0.52%
<b>Black Other</b>	519	0.24%
<b>Mixed</b>	1,652	0.76%
<b>Other ethnicities</b>	506	0.23%

Source: Table: MS-B01 Ethnic Group, Census 2021, NISRA.

<b>Religion or Religion Brought Up In</b>	<b>Armagh City, Banbridge and Craigavon</b>	<b>%</b>
<b>Catholic</b>	95,868	43.8%
<b>Protestant and Other Christian</b>	102,063	46.7%
<b>Other</b>	2,697	1.2%
<b>None</b>	18,028	8.2%
<b>Total</b>	<b>218,656</b>	<b>100.0%</b>

Source: Religion or Religion Brought Up In – Table MS-B23, Census 2021, NISRA.

5.10 With an increasing population within the authority boundaries, it is vital that bereavement services, their capacity and service level are assessed, reviewed and optimised on a regular basis to ensure the communities have access to funerary options which suit their preference.

5.11 Although legislation does not place a legal obligation on an authority to provide cemetery space, there is considerable need and moral obligation for the continuation of this service to the communities within the authority and beyond.

5.12 There remains a clear preference within the communities of the authority for traditional cemetery burial. However, the authority will aim to review the increasing trend for cremation and the immediate and long-term potential needs for the provision of a crematorium to the community.

5.13 It could be considered that the preference for traditional burial in modern times in Northern Ireland is as significant versus cremation due to comparative availability of options. With only two active crematoria and zero designated natural burial grounds, choice is considerably limited when comparing to the rest of the UK where circa 80% of people now choose cremation. Although cultural preference would likely still lean towards burial within the authority, there is a growing trend of cremation being a preference and a focus towards more environmentally friendly options within all funerary methods.

### **Service Delivery Specific**

5.14 Within the facilities operated by the authority, unity should be promoted and delivered to bring together the teams and facilities of the former three authorities and unite them as one, just as the Armagh, Banbridge and Craigavon Council is. This would ensure more efficient management of the service, practical use of and access to the service and many other benefits. This could begin with:

- Same contact information (main phonenumber, central shared email address etc) for each administrative access point.
- Same (digital) record keeping format, data management and diary systems for all administrative access to allow ease of access to information, management and bookings – this could be that the existing Clear Skies system is extended to include Banbridge (for example).
- Progress towards pay structure (overtime included) being equal for all staff on the same grade/performing the same duties.

5.15 Out of hours booking of funeral services is often a useful tool for key stakeholders and there is currently no formal out of hours arrangement in place, it therefore needs to be decided whether:

- A 24 hour (online) booking system is introduced,
- A continuous "on-call" staff rota arrangement for phone coverage is employed,
- Or bookings are restricted and made possible during office hours only.

## 6. Cemetery Rules and Regulations

- 6.1 Born from the Burial Grounds Regulations (Northern Ireland) 1992, the authority's cemetery rules and regulations are the basis for the management of the cemetery spaces within the council.
- 6.2 They enable the public, funeral directors and memorial masons to understand the rules that the authority applies within all council cemeteries. In addition, officers of the authority follow these rules and regulations to ensure the cemeteries are managed and operated in a "common sense", practical and sympathetic manner. This also ensures consistency across all authority-controlled cemeteries.
- 6.3 Detailed cemetery rules can be sourced in physical form from the authority's officers, however, some rules pertaining to cemetery spaces can be found online via the below:  
<https://www.armaghbanbridgecraigavon.gov.uk/resident/cemeteries/>
- 6.4 Residency discount is afforded to people who reside within the boundaries of ABC at the time of grave purchase or death. Proof of residency may be required prior to purchase or burial.
- 6.5 Cemetery Fees and Charges are reviewed and set annually based on the challenges and costs projected through maintaining and developing the cemetery spaces in order to meet the needs of the bereaved and maintain the standards set. Fees and charges can be found using the same link above, under the "Cemetery Charges" header.

## 7. Data Management

- 7.1 The authority has a legal obligation under the Burial Regulations (Northern Ireland) 1992 to manage burial records and retain information relating to each grave space. This has been managed through hardcopy record keeping within Banbridge cemeteries and digital record keeping within Armagh and Craigavon cemeteries – all data relating to any living person is subject to the Data Protection Acts and is managed accordingly.
- 7.2 The authority and its stakeholders would benefit from all cemeteries being administratively managed digitally to allow for ease of access, proficient record keeping, data back-up and security (if using a cloud-based system).
- 7.3 A unified digital system would also allow for the provision of a 24-hour online booking system, public record access (where permitted) for all cemeteries – easing administrative capacity and enhancing the service to the public and key stakeholders.

## 8. Burials and Graves

### **Cemeteries**

- 8.1 The authority currently offers the below options for grave spaces within its cemeteries:
- Traditional full memorial graves
  - Lawn headstone graves
  - Baby graves
  - Cremated remains tablets with ashes interred.
- 8.2 The authority is to ensure that the appearance of their cemeteries is maintained and presented well to create as pleasant an environment as possible through effective grounds maintenance.
- 8.3 The authority should expect a rise in demand for cemetery space should the overall population and (within that) the demographic of older people increase as outlined in Section 5. This along with church graveyards approaching capacity without space to expand will mean that, over time, authority led cemetery spaces will increasingly become the remaining option, subject to the availability/introduction of private cemetery spaces.
- 8.4 Due to the higher growth rate compared to the NI overall rate and church graveyards progressing towards reaching their capacity, the authority may expect that available cemetery space will reach capacity sooner than projected.
- 8.5 Needs assessments or review for further cemetery space should be performed on a regular basis, drawing comparative data with remaining cemetery space versus space usage. Performing this along with a review of service user needs (to determine preference of funeral services) will enable effective future planning.
- 8.6 The provision of cemetery space in Northern Ireland is a critical service during any period of excess death (such as a pandemic). In such times, the authority should work with neighbouring councils and the Department of Justice of the Northern Ireland Executive to manage the needs and demands placed on the service. The authority will also ensure that a current Excess Death Contingency Plan is in place and reviewed at regular intervals to ensure it can be ready to be enacted should there be a need.
- 8.7 The authority has a legal obligation to provide public health funerals, this is where a person's estate is unable to cover their funeral expenses, and/or any person surviving them is unable to or unwilling to pay for their funeral expenses. Public health funerals are treated with the same dignity and respect as any other funeral being cared for by the authority and will ensure that a coffin, funeral director and either cremation or burial are provided for by the authority. Where a grave space is used, these are

deemed as un-purchased graves, and no memorial can be placed unless funerary expenses are met.

- 8.8 It has been identified that the authority does not currently have a shallow grave policy – it may be useful to adopt the ICCM’s shallow grave policy which can be found at: [https://www.iccm-uk.com/iccm/wp-content/library/iccm\\_ShallowGraves.pdf](https://www.iccm-uk.com/iccm/wp-content/library/iccm_ShallowGraves.pdf)

### **Natural Burial**

- 8.9 The current burial options available within the authority’s cemetery spaces affords traditional options to families. However, there is a growing desire in the UK for natural burial options as a funerary preference.
- 8.10 The following is taken from the MoJ’s Natural Burial Grounds – Guidance for Operators:
- 8.11 “Natural burial is a term used to describe the burial of human remains where the burial area creates habitat for wildlife or preserves existing habitats (woodland, species rich meadows, orchards, etc), sustainably managed farmland, in-situ or adjacent aquatic habitats or improves and creates new habitats which are rich in wildlife (flora and fauna). Where a funeral precedes such burial, it would typically seek to minimise environmental impact.”
- 8.12 Otherwise referred to as green burial or woodland burial, natural burial could enhance the authority’s offering to its community and meet the potential need for people who would prefer a natural option without the risk of emissions from cremation, degradation of chemicals from a manufactured coffin, the environmental impact of materials used for a headstone or the ecological impact of embalming fluid, and instead may prefer an option to fulfil a desire to minimise their environmental impact – a goal and obligation which the authority should share.
- 8.13 As well as the benefit of choice to the public, the authority would benefit from a natural burial ground as it would enhance the biodiversity of a site, reducing its carbon footprint by creating areas/settings such as a woodland, meadow or orchard etc.

### **Cremated Remains**

- 8.14 As the preference for cremation increases, so too does the need for respectful disposal of cremated remains. Introducing a dedicated area, interment/vault options and/or gardens for cremated remains as laid out within the Operational Review will offer the bereaved the benefit of choice and allow the authority to introduce memorialisation options alongside to enable the bereaved to commemorate their loved ones.

## 9. Health and Safety

- 9.1 The authority has a legal duty under the Health & Safety and Work Order (NI) 1978 and The Management of Health & Safety at Work Regulations (NI) 2000 to ensure that burial grounds are safe places to work & visit.
- 9.2 The authority provides for its Health and Safety standards within its written Rules and Regulations which are updated appropriately within the council's wider Health and Safety policies.
- 9.3 Risk Assessments should be carried out regularly to identify hazards and ensure the appropriate controls are in place to minimise the risk associated with the tasks/activities.
- 9.4 Shoring of graves is a minimum standard requirement when preparing a grave space for burial, hydraulic shoring being a good option. This must be implemented in all cemeteries and installed in each prepared grave space to ensure graveside safety is optimal. The Health and Safety Executive (HSE) advice is that no excavation is a safe excavation and as soon as you can get shoring into a grave, you should do so. Both employees and members of the public are at risk around a grave space and shoring minimises the danger to them.
- 9.5 Cemetery staff should be fully aware of the likely risks and trained in safety awareness. Staff are to be supplied with the appropriate equipment to carry out the functions of their roles safely. Staff should be adequately supervised/managed and any non-compliance with safety procedures should be fully investigated.

## 10. Testing of Memorials and Headstones

- 10.1 There is significant risk associated with unsafe memorialisation.
- 10.2 The council should implement a routine inspection of all headstones and memorials within its authority, with each memorial being checked cyclically on a (minimum) 5-year basis unless observations are made requiring a shorter timeframe between inspection. Spot or random checks should be made at every opportunity – for example, when checking or marking a grave space for burial (or when excavating a grave space), neighbouring memorials could be checked at that point. Records of checks need to be kept per cycle to monitor any progression of issue. The Ministry of Justice has issued advice for unstable memorials; this document can be accessed for reference and used as a basis for creating a process – it can be found through an online search for “Managing the safety of Burial Ground Memorials” under Ministry of Justice.

10.3 The authority can benefit from becoming a member of a recognised memorial mason association who could provide guidance, information and training. There is also the ICCM who offer specific training courses on this subject.

## 11. Maintenance

11.1 The authority manages many hectares of cemetery space across the council and recognises that the appearance of the cemeteries is enhanced by well-kept and presentable grave spaces.

11.2 Duties performed by the cemetery operatives would often include:

- Excavation of grave spaces
- Assisting interments
- Cutting grass
- Weeding
- Topping up of graves
- Cleaning and tidying up
- Inspection of approved memorial removal/installation
- Testing of memorialisation/headstones

11.3 These duties are to prevent degradation of grave spaces and the cemeteries as a whole. It is to also limit or prevent possible trip hazards from subsidence of earth, debris from natural sources and unsafe memorialisation.

11.4 The authority will endeavour to maintain all its cemeteries to create an accessible, safe, pleasant, peaceful and tranquil environment.

11.5 Memorialisation and headstones are the property and responsibility of the deed holder to the grave space and are not the property or responsibility of the authority, unless within the requirements of making an area safe.

## 12. Consultation and Liaison

12.1 The authority and its bereavement service will benefit from regular communication with its key stakeholders – namely; funeral directors, faith leaders, celebrants, memorial masons, Friends groups and any similar professionals.

12.2 The authority should provide for regular meetings with willing key stakeholders to raise/discuss any and all issues, concerns, praise or complaints to form an action plan for service users.

## 13. Demands and Needs

13.1 Further to the data within Section 5, below is a table displaying the projected population changes from 2020 to 2043 within the authority and the age demographic from that:

<b>Age Group</b>	<b>ABC 2020</b>	<b>ABC 2043</b>	<b>ABC Change (No.)</b>	<b>ABC Change (%)</b>	<b>Northern Ireland Change (%)</b>
<b>0-15 years</b>	48,872	47,450	-1,422	-2.9%	-11.3%
<b>16-24 years</b>	21,132	24,385	3,253	15.4%	-0.1%
<b>25-49 years</b>	72,155	76,934	4,779	6.6%	-4.4%
<b>50-64 years</b>	40,906	46,569	5,663	13.8%	1.2%
<b>65 and over</b>	34,167	55,532	21,365	62.5%	50.5%
<b>Total</b>	<b>217,232</b>	<b>250,870</b>	<b>33,638</b>	<b>15.5%</b>	<b>4.9%</b>

Source: 2020 Mid-Year Population Estimates and 2018 Based Population Projections, NISRA.

13.2 From this we can clearly see that the population within the authority is expected to both increase and age.

13.3 With an older population year on year, it is likely that the death rate will also increase in tandem, meaning that the service will likely see an increase in funerals taking place and demand for grave spaces increasing with this.

Demand for grave spaces could be subject to:

- Accuracy of the projections
- Net migration
- Availability of crematoria
- Approach to funerary methods remaining the same or similar
- Limited space in church graveyards as capacity is reached and dependency on authority cemeteries thereafter

### **Short-Term**

13.4 The authority needs to continue the provision of accessible grave spaces, ensuring that new cemetery space is provided for in good time – with each of the 6 cemeteries requiring action to secure space provision for the years to come.

## Long-Term

- 13.5 The authority will likely experience an increase in demand for cemetery provision over the long term given the increase in the number of older people living in the area. This would lead to the acquisition of further cemetery space likely being required.
- 13.6 Northern Ireland is presently traditional in its approach to funerary preference. However, there is beginning to be a clear trend for the desire to have alternative options available. Reviewing the possibilities for cremation and alternative burial options offered to the communities served would allow for potential avenues to be explored to benefit the service offered.
- 13.7 As cremation becomes more widely available with two active crematoria, an application approved for a crematorium in Moira and a long-term application with permission granted for Fermanagh and Omagh District Council with a decision expected to be made to build in 2026, it is looking likely that cremation will become an increasingly popular option in Northern Ireland.

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